LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

8th, Grand and Hope Project

Case Number: ENV-2017-506-EIR

Project Location: 754 South Hope Street; 609 and 625 West 8th Street, Los Angeles, California 90017

Community Plan Area: Central City

Council District: 14—Huizar

Project Description: The Project proposes to develop a 45-story mixed-use building on an approximately 36,178-square-foot (0.83-acre) site located within the Central City Community Plan Area of the City of Los Angeles (City). The Project would consist of 547 residential dwelling units, up to 7,499 square feet of ground floor commercial/retail/restaurant space, and 37,216 square feet dedicated to a charter school for grades K–5 (hereinafter referred to as the Project). The Project would provide a maximum of 562,696 square feet of floor area with a Floor Area Ratio (FAR) of 9.37:1. In addition, the Project includes an option wherein an additional 33 residential units may be constructed in lieu of the school use, resulting in a total of 580 residential units for the option. Under this scenario in which the school is not developed, a maximum of 556,459 square feet of floor area would be developed with a total FAR of 9.27:1. The Project would also include three subterranean levels to a maximum depth of 63 feet below ground level. With 45 stories, the building would have a maximum height of 592 feet above ground level. The parking would be provided in three subterranean levels and on four levels above the street level uses. To accommodate the Project, an existing surface parking lot and four-level parking structure would be demolished.

PREPARED FOR:
The City of Los Angeles
Department of City Planning

PREPARED BY:
Eyestone Environmental, LLC

APPLICANT:
Mitsui Fudosan America

May 2019

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1. INTRODUCTION

An application for the proposed 8th, Grand and Hope Project ("Project") has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study (IS) evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration or Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the Lead Agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1. INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for the proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the lead agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide public agencies and the general public an opportunity to review the Draft EIR and comment on the adequacy of the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to all comments on environmental issues are prepared.

1.3.3 Final EIR

The lead agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the lead agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program to ensure that all proposed mitigation measures are implemented.

If the Project is approved, then within five days of the action, the City files a Notice of Determination with the County Clerk. The Notice of Determination is posted by the County Clerk within 24 hours of receipt. This begins a 30-day statute of limitations on legal challenges to the approval under CEQA. The ability to challenge the approval in court may be limited to those persons who objected to the approval of the project, and to issues that were presented to the Lead Agency by any person, either orally or in writing, during the public comment period.

INITIAL STUDY

2. EXECUTIVE SUMMARY

PROJECT TITLE	**8TH, GRAND AND HOPE**
ENVIRONMENTAL CASE NO.	ENV-2017-506-EIR
RELATED CASES	CPC-2017-505-TDR-ZV-ZAI-DD-SPR, VTT-74876

PROJECT LOCATION	**754 SOUTH HOPE STREET; 609 AND 625 WEST 8TH STREET, LOS ANGELES, CA 90017**
COMMUNITY PLAN AREA	CENTRAL CITY
GENERAL PLAN DESIGNATION	REGIONAL CENTER COMMERCIAL
ZONING	C2-4D (COMMERCIAL, HEIGHT DISTRICT 4, DEVELOPMENT LIMITATION)
COUNCIL DISTRICT	14—HUIZAR

LEAD CITY AGENCY	**CITY OF LOS ANGELES DEPARTMENT OF CITY PLANNING**
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PHONE NUMBER	(213) 321-3493

PROJECT DESCRIPTION

The Project proposes to develop a 45-story mixed-use building on an approximately 36,178-square-foot (0.83-acre) site located within the Central City Community Plan Area of the City of Los Angeles (City). The Project would consist of 547 residential dwelling units, up to 7,499 square feet of ground floor commercial/retail/restaurant space, and 37,216 square feet dedicated to a charter school for grades K–5 (hereinafter referred to as the Project). The Project would provide a maximum of 562,696 square feet of floor area with a Floor Area Ratio (FAR) of 9.37:1. In addition, the Project includes an option wherein an additional 33 residential units may be constructed in lieu of the school use, resulting in a total of 580 residential units for the option. Under this scenario in which the school is not developed, a maximum of 556,459 square feet of floor area would be developed with a total FAR of 9.27:1. The Project would also include three subterranean levels to a maximum depth of 63 feet below ground level. With 45

stories, the building would have a maximum height of 592 feet above ground level. The parking would be provided in three subterranean levels and on four levels above the street level uses. To accommodate the Project, an existing surface parking lot and four-level parking structure would be demolished.

(For additional detail, see “Section 3. Project Description”).

ENVIRONMENTAL SETTING

The Project Site is specifically bounded by two parking structures to the north, 8th Street to the south, Grand Avenue to the east, and Hope Street to the west. Primary regional access is provided by State Route 110 (SR-110 or Harbor Freeway), which runs north-south approximately 0.3 mile west of the Project Site. The Project Site is zoned C2-4D and is currently developed with a low-rise four-level parking structure and a surface parking lot that is entirely paved and devoid of landscaping. The existing parking structure and surface parking lot currently provide 324 parking spaces, which are used for commercial parking by businesses in the area.

Surrounding uses in the vicinity of the Project Site are similarly zoned C2-4D and developed with commercial, retail, restaurant, multi-family residential, and parking uses. Immediately to the north of the Project Site are two parking structures—an eight-story structure along Hope Street and a five level structure along Grand Avenue. Across Hope Street to the west of the Project Site is a recently-renovated business/commercial development (i.e., The Bloc), consisting of a department store, hotel, gym, cinema, retail and restaurant uses, and an office tower. To the east of the Project Site is a mixed-use development (i.e., Eighth & Grand), consisting of a mid-rise residential complex with a ground floor market. To the south of the Project Site are multiple office/commercial buildings and other residential developments, including a high-rise residential tower (i.e., 8th+Hope) immediately to the southwest, two mixed-use high-rise buildings at 801 S. Grand Avenue and 888 S. Hope Street, and three other high-rise residential towers (i.e., Atelier, 845 S. Olive Street Tower, and 820 S. Olive Street Tower) to the southeast on Olive Street between 8th Street and 9th Street.

(For additional detail, see “Section 3. Project Description”).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g., permits, financing approval, or participation agreement)

Potentially including, but not limited to, the Regional Water Quality Control Board and the South Coast Air Quality Management District.

CALIFORNIA NATIVE AMERICAN CONSULTATION

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

No, consultation has not yet commenced.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code Section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☒ Greenhouse Gas Emissions	☒ Public Services
☐ Agriculture & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology/Water Quality	☒ Transportation
☐ Biological Resources	☒ Land Use/Planning	☒ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☒ Utilities/Service Systems
☒ Energy	☒ Noise	☐ Wildfire
☐ Geology/Soils	☐ Population/Housing	☒ Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Polonia Majas	Planning Assistant
PRINTED NAME	**TITLE**
SIGNATURE	May 10, 2019 **DATE**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.

    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

    a) The significance criteria or threshold, if any, used to evaluate each question; and

    b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3. PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project proposes to construct a 45-story mixed-use project comprised of a maximum of 562,696 square feet of floor area, with 547 residential dwelling units, up to 7,499 square feet of ground floor commercial/retail/restaurant space, and 37,216 square feet dedicated to a charter school for grades K–5 (hereinafter referred to as the Project). The Project also includes an option wherein an additional 33 residential units may be constructed in lieu of the school use, resulting in a total of 580 residential units for the option. These two options are referred to herein as the "School Option" and the "No School Option," respectively. To accommodate the Project, an existing surface parking lot and four-level parking structure would be demolished.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

As shown in Figure 1 on page 10, the Project Site is located within the Financial Core District of Downtown Los Angeles, approximately 14 miles east of the Pacific Ocean. Primary regional access is provided by State Route 110 (SR-110 or Harbor Freeway), which runs north-south approximately 0.3 mile west of the Project Site. The Project Site is specifically bounded by two parking structures to the north, 8th Street to the south, Grand Avenue to the east, and Hope Street to the west. Major arterials providing regional access to the Project vicinity include Grand Avenue, Figueroa Street, and Olympic Boulevard. The Project Site is located within a Transit Priority Area (TPA) (shown in Figure 2 on page 11), as defined by Senate Bill (SB) 743 and City Zoning Information (ZI) File No. 2452. In addition, the Metro 7th Street/Metro Center Station is located approximately 550 feet north of the Project Site.

3.2.2 Existing Conditions

Rectangular in shape, the Project Site is comprised of two tax assessor parcels (APNs: 5144-011-009 and 5144-011-016), encompassing a total of approximately 36,178 square feet of lot area (0.83-acre).[2] The Project Site is currently developed with a low-rise four-level parking structure and a surface parking lot that is entirely paved and devoid of landscaping. The existing parking structure and surface parking lot currently provide 324 parking spaces, which are used for commercial parking by businesses in the area. Vehicular access for the existing commercial parking structure and surface parking lot is currently provided from four existing driveways with four existing curb cuts: one existing curb cut along Grand Avenue, two existing curb cuts along 8th Street, and one existing curb cut along Hope Street. A chain-link fence lines two sides of the parking lot along 8th Street and Grand Avenue. One street tree is situated along Hope Street, and six street trees line the sidewalk along 8th Street.

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[2] Per Los Angeles Municipal Code (LAMC) Section 14.5.3, for the purposes of computing the maximum Floor Area Rights available through the approval of a Transfer Plan for a Transit Area Mixed Use Project, the buildable area shall include the lot area plus the area between the exterior lot lines and the centerline of any abutting public right-of-way. The area to the centerline of the adjacent public rights-of-way is 60,022 square feet (1.38 acres).

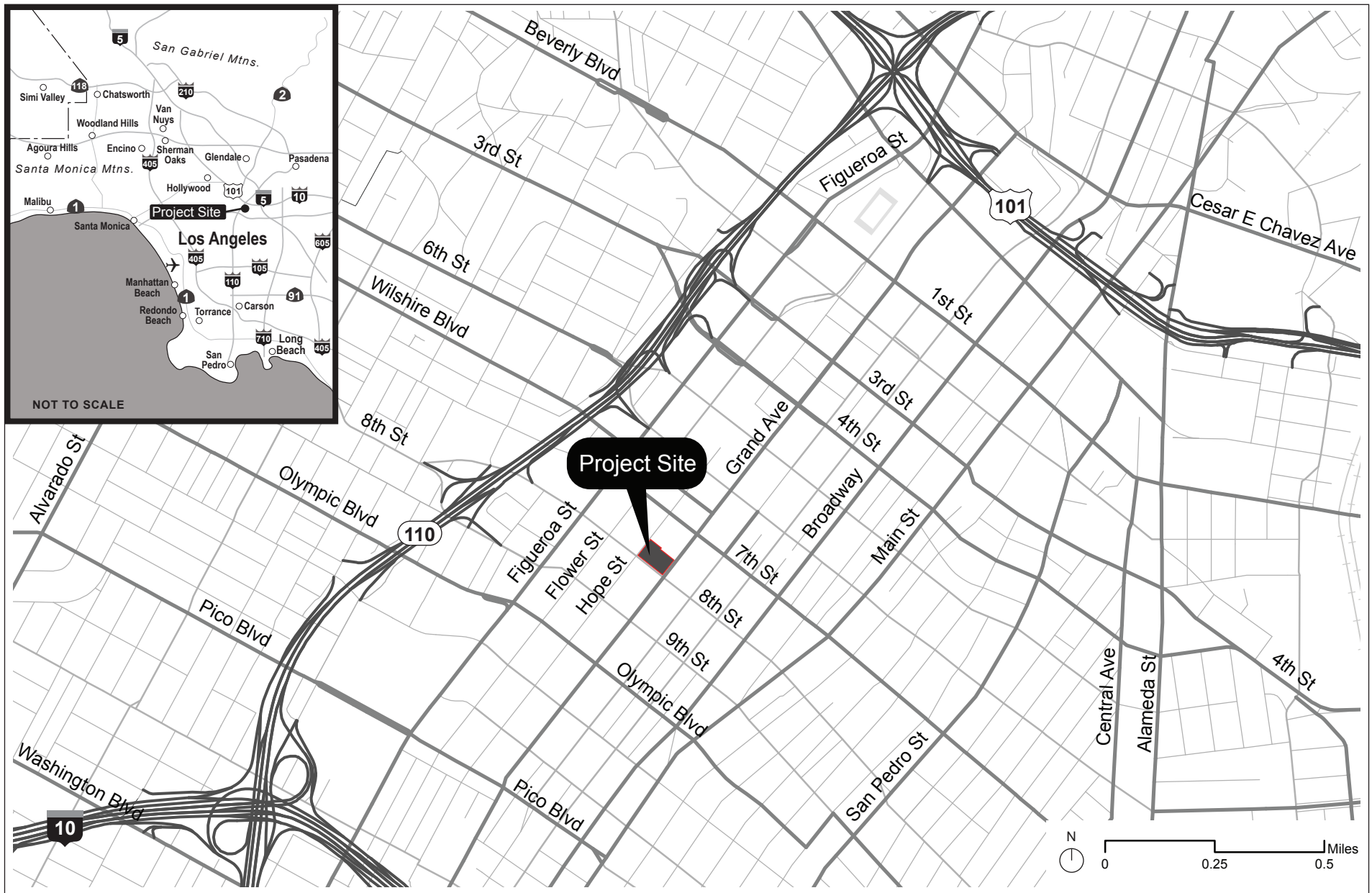

Figure 1
Project Location Map

Source: LA County GIS; Eyestone Environmental, 2019.

Figure 2
Location of Project Site within a Transit Priority Area

Source: Eyestone Environmental, 2019.

The Project Site is located within the planning boundary of the Central City Community Plan (Community Plan) area and, more specifically, is located within its Financial Core. Under the Community Plan, which was last updated in January 2003, the Project Site has a General Plan land use designation of Regional Center Commercial.

The entire Project Site is zoned by the Los Angeles Municipal Code (LAMC) as C2-4D (Commercial, Height District No. 4). The Commercial zones permit a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits any land uses permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations. Height District No. 4 within the C2 zone does not impose any height limit with an allowable maximum Floor Area Ratio (FAR) of 13:1.

However, while Height District No. 4 permits an FAR of 13:1, the maximum permitted floor area of the Project Site is restricted by the "D" limitation, which restricts the FAR to 6:1 without a transfer of floor area rights (TFAR), pursuant to Ordinance No. 164,307. In the vicinity of the Project Site, there are numerous similarly zoned sites (subject to the same "D" limitation) developed with commercial tower buildings, including the Ernst & Young Building (at 725 S. Figueroa Street on the southwestern corner of 7th Street and Figueroa Street), the 777 Tower (at 777 S. Figueroa Street on the northwestern corner of 8th Street and Figueroa Street), the 801 Tower (at 801 S. Figueroa Street on the southwestern corner of 8th Street and Figueroa Street), 8th+Hope Tower (at 801 S. Hope Street on the southwestern corner of 8th Street and Hope Street), 801 S. Grand Building (at the southwestern corner of 8th Street and Grand Avenue), and the Wilshire Grand Center (at 900 Wilshire Boulevard on the northwestern corner of 7th Street and Figueroa Street).

3.2.3 Surrounding Land Uses

As shown in Figure 3 on page 13, the Project Site is located in a highly urbanized area dominated by high-rise buildings. Surrounding uses in the vicinity of the Project Site are similarly zoned C2-4D and developed with commercial, retail, restaurant, multi-family residential, and parking uses. Immediately to the north of the Project Site are two parking structures—an eight-story structure along Hope Street and a five-level structure along Grand Avenue. Across Hope Street to the west of the Project Site is a recently renovated business/commercial development (i.e., The Bloc), consisting of a department store, hotel, gym, cinema, retail and restaurant uses, and an office tower. To the east of the Project Site is a mixed-use development (i.e., Eighth & Grand), consisting of a mid-rise residential complex with a ground floor market. To the south of the Project Site are multiple office/commercial buildings and other residential developments, including a high-rise residential tower (i.e., 8th+Hope) immediately to the southwest, two mixed-use high-rise buildings at 801 S. Grand Avenue and 888 S. Hope Street, and three other high-rise residential towers (i.e., Atelier, 845 S. Olive Street Tower, and 820 S. Olive Street Tower) to the southeast on Olive Street between 8th Street and 9th Street. In the Project vicinity, beyond these land uses are other high-rise buildings that include commercial and residential uses.

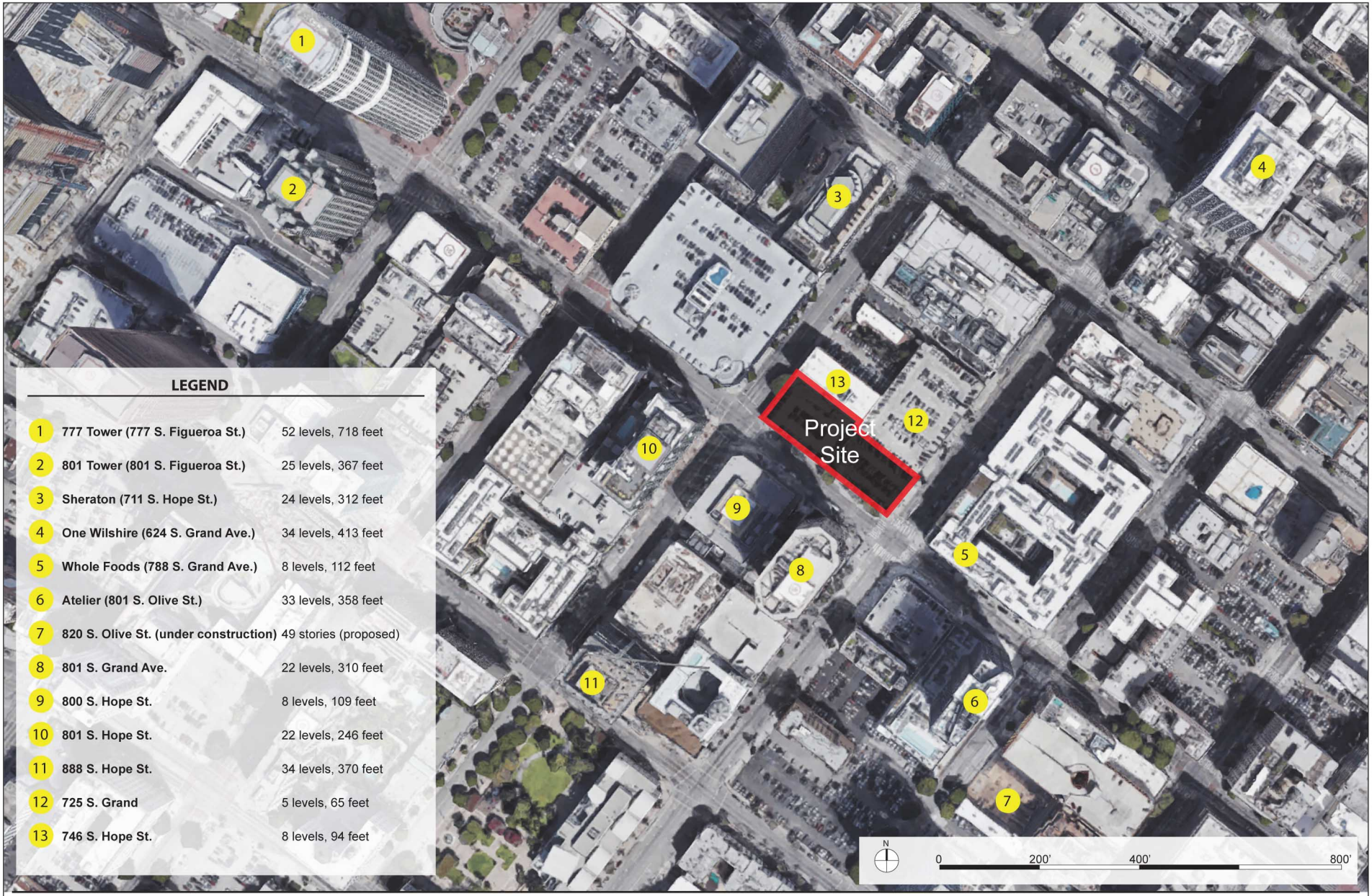

Figure 3
Aerial Photograph of the Project Vicinity

Source: Google Maps, 2018; Eyestone Environmental, 2019.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project proposes to develop a mixed-use project, consisting of 547 residential units, a 37,216-square-foot school, and up to 7,499 square feet of ground level commercial/retail/restaurant uses on a 0.83-acre site.[3] As presented in Table 1 on page 15, the Project would provide a maximum of 562,696 square feet of floor area with a FAR of 9.37:1. As described in more detail below, the Project includes an option to develop an additional 33 residential units (for a total of 580 residential units) in the event that the school is not developed. Under this "No School Option," a maximum of 556,459 square feet of floor area would be developed with a total FAR of 9.27:1. To accommodate the Project, the existing parking structure and surface parking lot would be demolished.

As shown in Figure 4 through Figure 7 on pages 16 through 19, the Project would involve the development of a 45-story, high-rise, mixed-use building with three below-grade levels. The maximum depth of the subterranean levels would be approximately 63 feet below ground level, and the maximum height of the building would be 592 feet above ground level. The proposed building would be comprised of four above-ground tiers with varying stepbacks from Hope Street.

Under the Project option with the school, referred to as the "School Option," the Project would include 14 classrooms and ancillary facilities to support a charter school for up to 400 students in grades K–5. Under the School Option, the ground floor of the new building would be occupied by commercial/retail/restaurant uses at the corner of Hope Street and 8th Street, a school lobby along 8th Street, and the residential lobby at the corner of Grand Avenue and 8th Street. Levels 2 through 5 would be occupied with the school space comprised of classrooms, common areas, a lunch room, and offices. Large operable exterior openings would allow the school's Level 2 multi-purpose common areas to open to the outdoors. The same condition would be applied through the upper floors of the school as well, creating an indoor/outdoor presence throughout the school. Exterior design elements would be continued across the exterior face of the garage to establish a unified architecture with the school and up to the top of the tower. Level 5 includes a covered outdoor play area for the school, as well as a covered dog park area for residents. The building's residential units would be located on Levels 6 through 44. Additional residential amenities would be located throughout the building.

Under the No School Option, the ground floor would be occupied by commercial/retail/restaurant uses at the corner of Hope Street and 8th Street and the residential lobby at the corner of Grand Avenue and 8th Street. The remainder of the building floors would be used for residential uses and associated amenities.

As described in more detail below, in accordance with LAMC requirements and when accounting for covenanted and recorded parking agreements, the Project would provide 563 parking spaces under the School Option and 594 parking spaces under the No School Option. These parking spaces would be located within seven levels. Three of the levels would be below grade and the four above grade levels would be obscured from view from adjacent streets by the Project's habitable space, exterior design elements similar to the rest of the tower cladding to create a unified architecture where the garage is not lined by an active use, and opaque party wall at the northerly property line where not fronting a street. In addition, as described in more detail below, 427 bike parking stalls would be provided under the School Option, and 388 bike parking stalls would be provided under the No School Option.

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[3] As described above, the gross lot area of the Project Site to the centerline of the adjacent public rights-of-way is 60,022 square feet (1.38 acres).

Table 1
Summary of Proposed Floor Area[a]

Land Use	Floor Area—School Option	Floor Area—No School Option
Residential	517,981 square feet (547 dwelling units)	548,960 square feet (580 dwelling units)
School	37,216 square feet	N/A
Commercial/Retail/Restaurant	7,499 square feet	7,499 square feet
Project Total	**562,696 square feet**	**556,459 square feet**

[a] *Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."*

Source: Eyestone Environmental, 2019.

As described above, while the Project Site's Height District No. 4 designation permits a FAR of up to 13 times the buildable area of the lot, the maximum permitted floor area of the Project Site is restricted by the "D" limitation, which restricts the FAR to 6 times the buildable area of the lot without a transfer of floor area (TFAR). Per LAMC Section 14.5.3, for the purposes of computing the maximum Floor Area Rights available through the approval of a Transfer Plan for a Transit Area Mixed Use Project, the buildable area shall include the lot area plus the area between the exterior lot lines and the centerline of any abutting public right-of-way. The Project Site's buildable area measured to the center line of the street is approximately 60,022 square feet. With a FAR of 6:1, the Project Site's buildable area of 60,022 square feet permits a total floor area of approximately 360,132 square feet. The Applicant is requesting approval of a TFAR to the Project Site (Receiver Site) from a Donor Site which, in this case, is the City-owned Los Angeles Convention Center at 1201 South Figueroa Street. Through the TFAR, the Project's School Option, at a FAR of 9.37:1, would require approximately 202,564 square feet of additional total floor area. The Project's No School Option would reduce the overall square footage by 6,237 square feet and result in a FAR of 9.27:1. As such, the No School Option would require a TFAR of approximately 196,327 square feet of additional total floor area. With the TFAR, the Project's FAR would be higher than the base FAR but less than the maximum 13:1 FAR allowed in Height District No. 4.

3.3.2 Design and Architecture

The Project would be designed in a contemporary architectural style. Building materials that are proposed to be used include different types of glass, concrete, aluminum, and stone. These varied surface materials would provide articulated features and high-quality design elements with window treatments, architectural design features, and building articulations to enhance the pedestrian space. The 45-story, high-rise, mixed-use building would be designed using glass and aluminum frame window wall with concrete, metal panel, and stone cladding. As shown in Figure 8 on page 20, the proposed building would be comprised of four above-ground tiers with varying stepbacks from Hope Street. Landscaped terraces would be located on the upper level of each tier. Through the stepped tower massing, the urban street wall would be articulated by the mass of the first tier of the building.

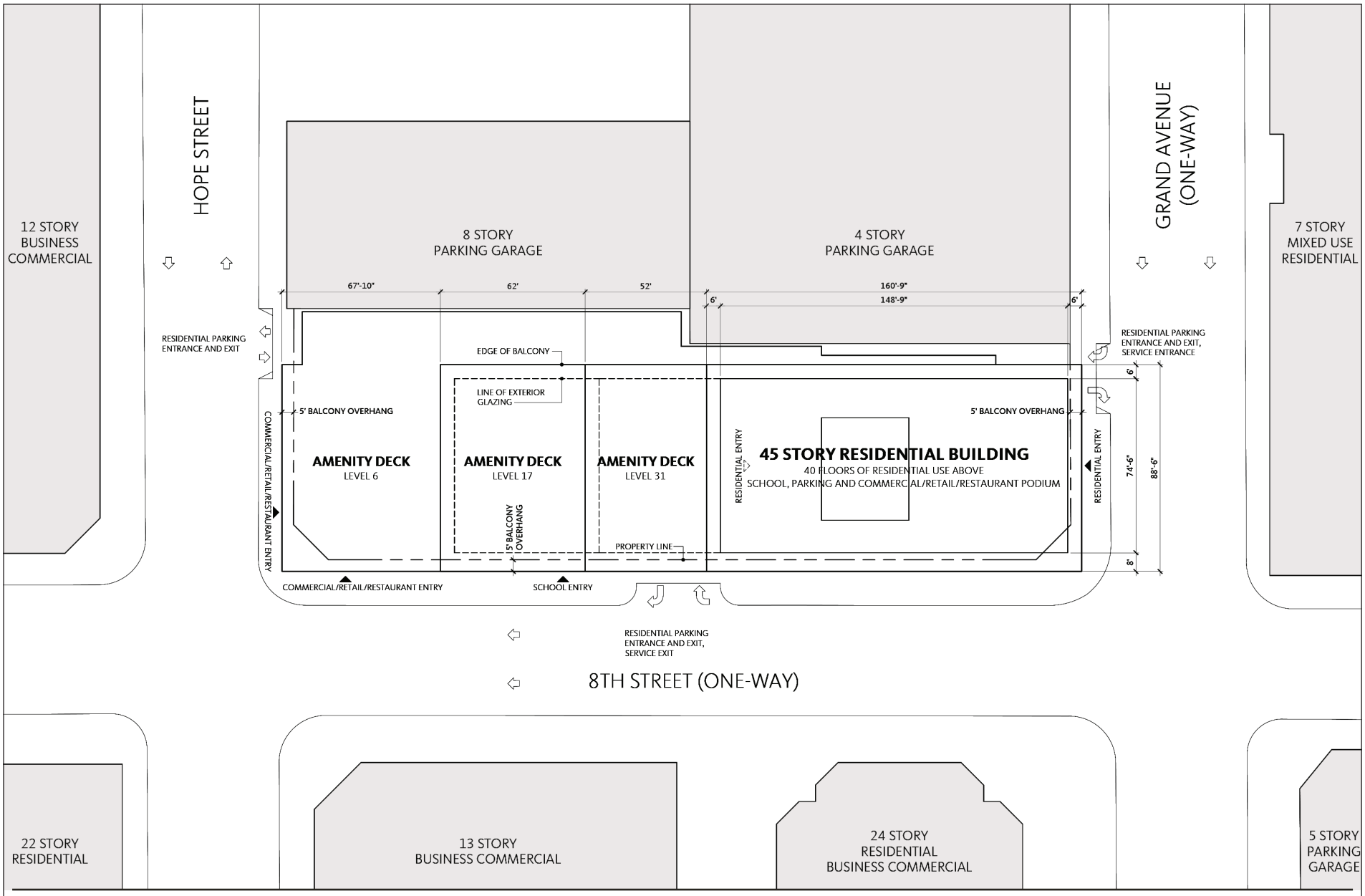

Figure 4
Conceptual Site Plan

Source: Gensler, 2019.

Figure 5

Site Plan—Level 1 (Ground Level)

Source: Gensler, 2019.

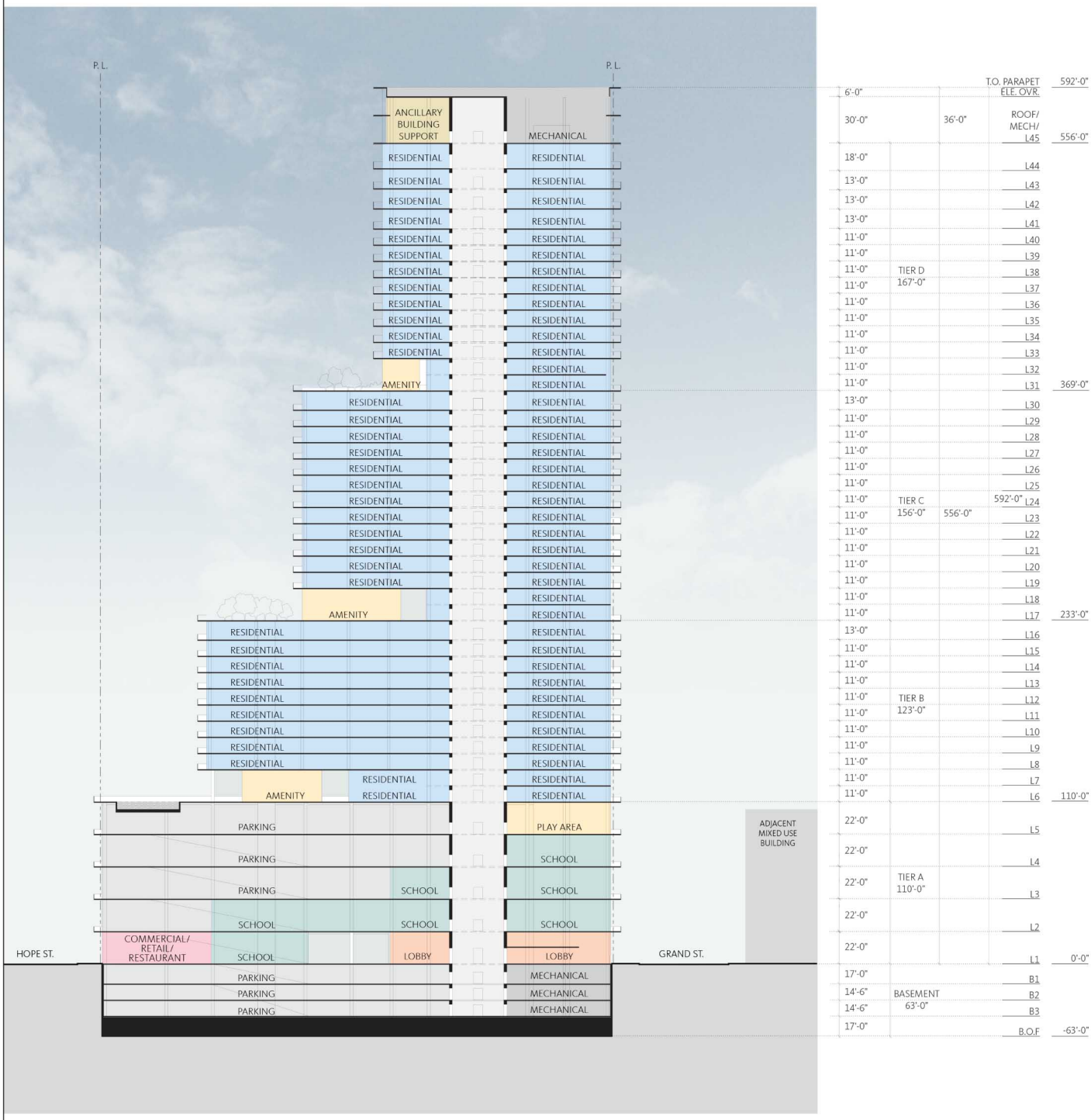

Figure 6
Building Section Looking North

Source: Gensler, 2019.

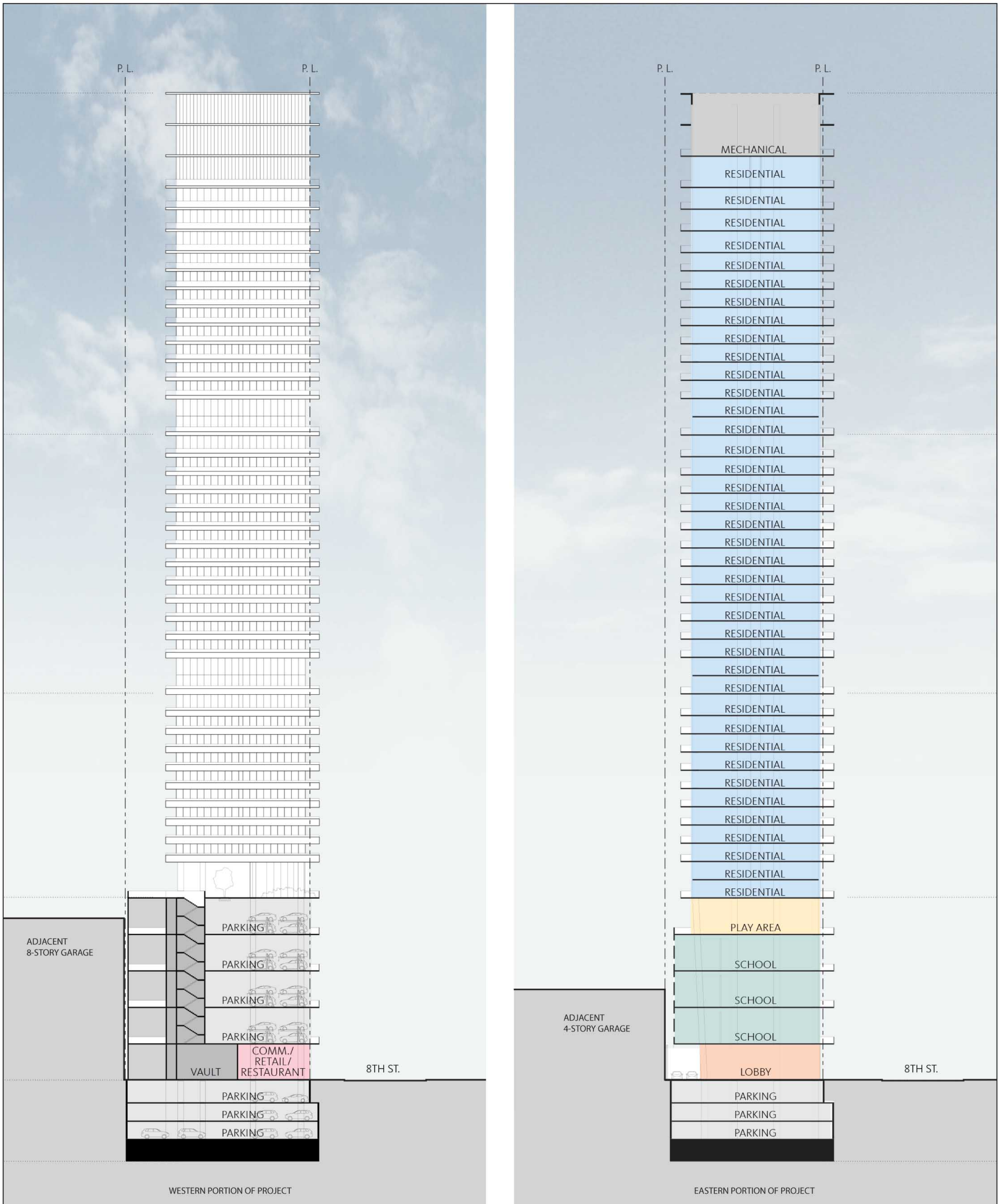

Figure 7

Building Section Looking East

Source: Gensler, 2019.

Figure 8
Conceptual Rendering—View from Southwest

Source: Gensler, 2019.

3.3.3 Open Space and Landscaping

LAMC Section 12.21-G requires open space for new developments with six or more dwelling units; however, the Greater Downtown Housing Incentive Area, LAMC Section 12.22-C,3(d), permits any percentage of the required open space to be provided as either private or common open space. Per LAMC Section 12.21-G, there shall be 100 square feet of open space provided for each residential unit having less than three habitable rooms; 125 square feet of open space provided for each residential unit containing three habitable rooms; and 175 square feet of open space provided for each residential unit containing more than three habitable rooms. Under the School Option, the Project is required to provide approximately 60,000 square feet of open space and would provide approximate 60,080 square feet of total open space. Under the No School Option, the Project is required to provide approximately 63,450 square feet of open space and would provide approximately 63,544 square feet of total open space. Although the Greater Downtown Housing Incentive Area eliminates required percentage allocation for common and private open space, the Project would incorporate 26,150 square feet of private balcony under the School Option and 27,850 square feet of private balcony under the No School Option.

Under the School Option, the Project would provide a number of indoor and outdoor common open space areas and recreational amenities, including 14,384 square feet of indoor open space and 19,546 square feet of outdoor open space. The No School Option would provide the same types of open space areas and recreational amenities, including 15,851 square feet of indoor open space and 19,843 square feet of outdoor open space. The common open space elements of the Project would be provided in a tiered terrace arrangement in several locations throughout the vertical levels of the building. As shown in Figure 9 through Figure 13 on pages 22 through 26, these would include a covered dog run area to accommodate pets on the Level 5; an indoor and outdoor common open space area with a pool, gym, spa, yoga pavilion, juice bar, barbeque and dining areas, seating, event lawn, and game lounge on Level 6; an indoor fitness area on Level 7; common indoor and outdoor open space featuring a coffee and snack bar, board room, sound lab, seating, and co-working spaces on Level 17; common indoor and outdoor open space featuring a pavilion, water feature, gathering garden, dining areas, a catering kitchen, and lounge on Level 31; and an indoor tenant lounge on Level 45. The Project would also provide balcony space throughout the residential portion of the Project.

As part of the Project along the street frontage, the Project would provide wide sidewalks with a row of street trees along 8th Street, Hope Street, and Grand Avenue. These trees would be selected in coordination with the City of Los Angeles Department of Urban Forestry. Overall, approximately 137 new trees would be provided by the Project's School and No School Options throughout the Project Site. In addition, the Project would provide sidewalk designs to improve pedestrian travel throughout the surrounding area. Improvements in the right-of-way would include special concrete paving patterns at driveway aprons (where cars and pedestrians cross paths) and at building entries and decorative bicycle racks near the commercial/retail/restaurant space and residential lobby. Limited street furniture, such as benches, may also be provided.

3.3.4 Access, Circulation, and Parking

The Project Site is transit accessible and is close to many bus transit lines, rail lines, and local shuttle service. Specifically, the Project Site is located approximately one block away from the Los Angeles County Metropolitan Transportation Authority's (Metro's) 7th/Metro Center Metro Rail station, which contains the Metro Red, Purple, Blue, and Expo Lines and is considered a hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. Metro bus lines, including local and rapid lines, as well as

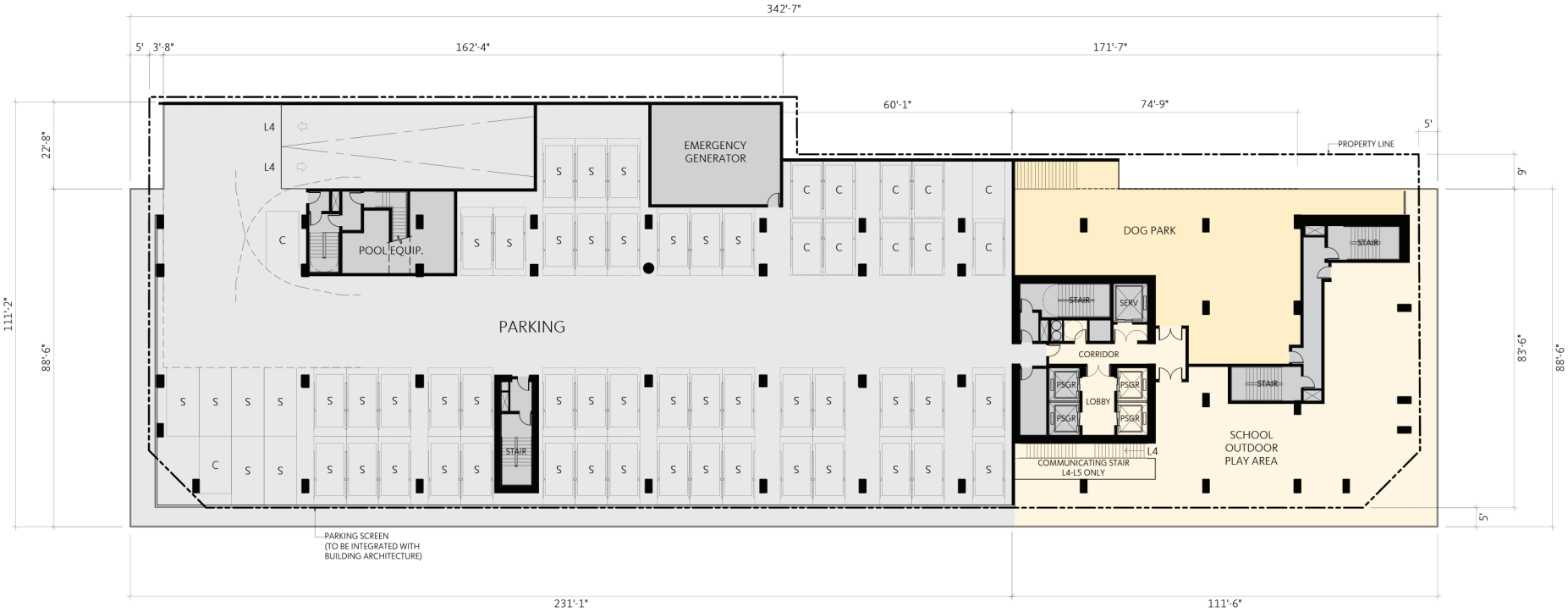

Figure 9

Open Space and Recreational Amenities—Level 5

Source: Gensler, 2019.

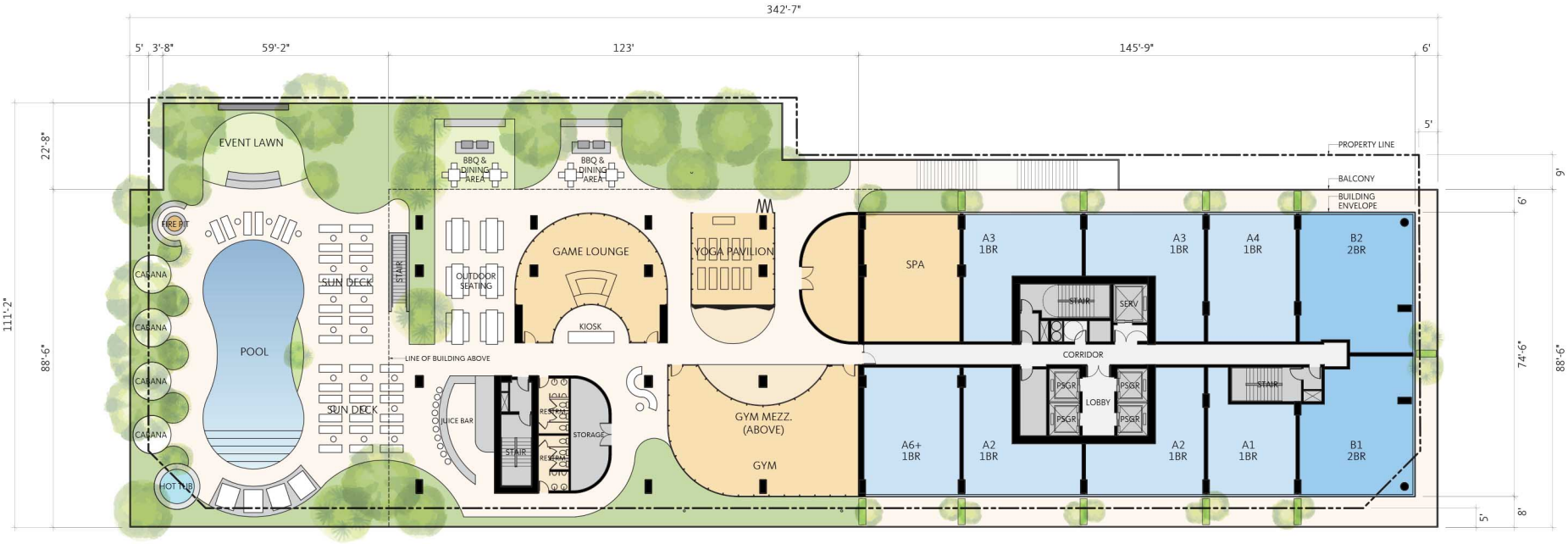

Figure 10

Open Space and Recreational Amenities—Levels 6 and 7 (Layered)

Source: Gensler, 2019.

Figure 11

Open Space and Recreational Amenities—Level 17

Source: Gensler, 2019.

Figure 12

Open Space and Recreational Amenities—Level 31

Source: Gensler, 2019.

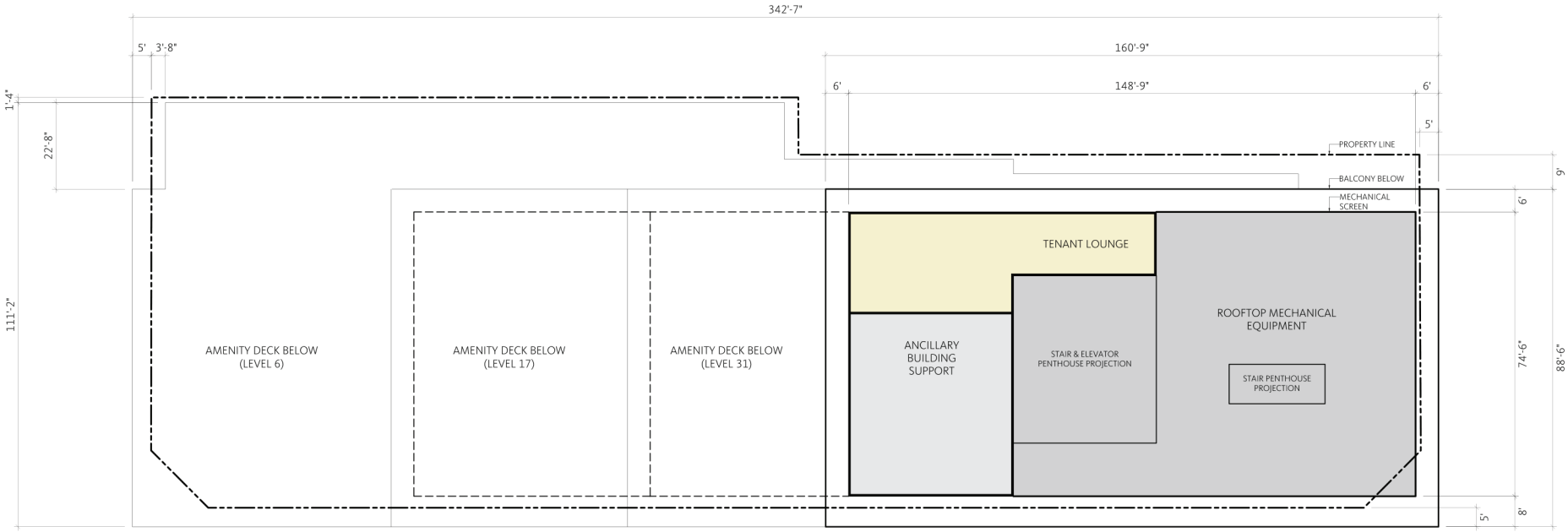

Figure 13

Open Space and Recreational Amenities—Level 45

Source: Gensler, 2019.

Los Angeles Department of Transportation's (LADOT's) Commuter Express lines, run south along Grand Avenue, with the nearest stop midblock on Grand Avenue between 7th Street and 8th Street. Metro Lines 66 and 81, as well as LADOT's Commuter Express Lines 419, 431, 437 and 534 and Antelope Valley Transit Authority's (AVTA) Commuter Line 785, run west on 8th Street. LADOT's DASH Lines have stops within one block north on 7th Street and within one block west on Flower Street. Also within two to three blocks of the Project Site are Silver Lines 910 and 950; Foothill Transit Lines SS, 493, 495, 497, 498, 499 and 699; Santa Monica's Big Blue Bus Line R10; Torrance Transit Line 4X; and Montebello Bus Lines 40 and 50. These bus lines connect passengers to the Project Site from various locations across the City and throughout Los Angeles County. Additionally, the Project Site is within walking distance of thousands of jobs in the Downtown area.

Vehicular access to the Project Site would be provided on 8th Street, Hope Street, and Grand Avenue. Loading and trash collection would be accessed from Grand Avenue, with loading and trash trucks exiting onto 8th Street. For the School Option, the Project would explore a number of options for school pick-ups and drop-offs, which would be implemented either individually or collectively. These could involve the use of the 8th Street curb; use of internal driveways; use of parking spaces in adjacent parking garages on Grand Avenue and/or on Hope Street; and active management of drop-off/pick-up times and operations in order to minimize the level of pick-up/drop-off activity at any given time.

The Project would provide parking for its residential uses at the ratios required by the Central City Parking Exception (LAMC Section 12.21-A,4(p)) and the Downtown Design Guide. In addition, the Project would utilize the 15-percent bicycle parking reduction for a residential project located within 1,500 feet of a major transit stop (LAMC Section 12.21-A,4). Prior to the bike parking reduction, the Project under the School Option would be required to provide 599 spaces for the 547 residential units; however, this would be reduced by 90 spaces to 509 spaces through bike parking replacement allowance for the residential component of the Project. Per the Central City Parking Exception District, no parking is required for the commercial/retail/restaurant component of the Project as the total square footage is less than 7,500 square feet. In addition, per LAMC Section 12.21-A,4(f), parking for the school will be provided at a ratio of one parking space per classroom, for a total of 14 spaces. As shown in Table 2 on page 28, the Project would provide a total of 515 parking stalls for the Project's residential component and 14 parking spaces for the school component, as well as 34 spaces for an adjacent building located at 611 W. 6th Street per covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248). Overall, 563 parking spaces would be provided for the School Option. In addition, 594 parking spaces would be provided for the No School Option, which would be comprised of the required 560 parking spaces for the residential uses and the 34 covenanted parking spaces. As described above, the proposed parking spaces would be located within seven levels. Three subterranean levels of the garage would be conventional heights and laid out primarily for tandem parking. The four upper garage levels feature higher floor-to-floor heights to accommodate two-car-high mechanical lifts. A typical configuration would be to have one mechanical tandem lift located in front of another tandem lift off of a drive aisle. A full-time parking attendant would retrieve cars for residents and school employees. The four above grade levels would be obscured from view from adjacent streets by the Project's habitable spaces and screening elements that unify the building architecture.

The Project would also provide the requisite short- and long-term residential and commercial bicycle parking spaces. A total of 299 bicycle parking stalls are required for the Project under the School Option, and 250 bicycle parking stalls in total are required for the Project under the No School Option. A total of 427 stalls are proposed for the School Option, and 388 stalls are proposed for the No School Option.

Table 2
Summary of Proposed Parking

Land Use	Floor Area—School Option	Floor Area—No School Option
Vehicle Parking		
Residential	515 vehicle spaces	560 vehicle spaces
School[a]	14 vehicle spaces	—
Commercial/Retail/Restaurant[b]	—	—
Covenanted[c]	34 vehicle spaces	34 vehicle spaces
Total	**563 vehicle spaces**	**594 vehicle spaces**
Bicycle Parking		
Residential	361 bicycle spaces (21 short-term, 340 long-term)	380 bicycle spaces (22 short-term, 358 long-term)
School	58 bicycle spaces (56 short-term, 2 long-term)	—
Commercial/Retail/Restaurant	8 bicycle spaces (4 short-term, 4 long-term)	8 bicycle spaces (4 short-term, 4 long-term)
Total	**427 bicycle spaces**	**388 bicycle spaces**

— = Not applicable

[a] *Per LAMC Section 12.21-A,4(f).*

[b] *Per the Central City Parking Exception District, no vehicle parking is required for the retail uses if proposed retail square footage is less than 7,500 square feet.*

[c] *Required vehicle parking spaces within the Project Site for the 611 West 6th Street building pursuant to covenanted and recorded parking agreements (PKG-4743, PKG-5261, PKG-5248).*

Source: Eyestone Environmental, 2019.

3.3.5 Lighting and Signage

Proposed signage would include mounted Project identity signage, building and commercial tenant signage, general ground-level and wayfinding pedestrian signage, and security markings in compliance with code requirements. Project identity signage would be visible from vehicular and pedestrian traffic and serve as an identifier for the Project by using approved logo and brand standards. Commercial, retail, and restaurant signage would be designed to complement the building architecture. Wayfinding signs would be located at parking garage entrances, elevator lobby, vestibules, and residential corridors. No off-premises billboard advertising is proposed as part of the Project. All proposed signage would be designed in conformance to applicable LAMC requirements, sign ordinance, and the Downtown Design Guide.

Exterior lighting along the public areas would include pedestrian-scale fixtures and elements. Project lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the site. As required by LAMC Section 93.0117(b), exterior light sources and building materials would be designed such that they would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses, such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units. Project lighting would also follow the streetscape lighting standards as established by the Downtown Design Guide.

All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to approval by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties.

3.3.6 Site Security

During construction of the Project, temporary security measures, including security fencing, lighting, and locked entry, would be implemented to ensure security of the Project Site. The Applicant would also implement the following features to enhance on-site safety:

- Lobby areas that are designed to be visible from the public streets or entry ways;
- Building entrances and exits, spaces around buildings, and pedestrian walkways that are designed to be open and in view of surrounding sites;
- Public spaces that are designed to be easily patrolled and accessed by safety personnel;
- Sufficient lighting of building entries and walkways to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings;
- Sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment; and
- Access controls in the forms of private on-site security, alarm systems, a closed-circuit security camera system, and keycard entry for the creative office building and the parking areas.

3.3.7 Sustainability Features

The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. "Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code, which also incorporates various provisions of the California Green Building Standards Code (CALGreen), and the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program in order to meet LEED certified equivalent building standards. These include energy conservation, water conservation, waste reduction features, and a pedestrian- and bicycle-friendly site design. The Project would also utilize sustainable planning and building strategies and incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials, whenever feasible. The sustainability features to be incorporated into the Project would include, but would not be limited to, WaterSense-labeled plumbing fixtures and weather-based controller and drip irrigation systems to promote a reduction of indoor and outdoor water use, Energy Star–labeled products and appliances, and water-efficient landscape design. The Project would also include energy-efficient lighting technologies and fenestration designed for solar orientation. The proposed use of continuous balconies along portions of the building would also provide passive shading for indoor spaces, reducing energy consumption and allowing for increased natural daylighting and natural ventilation via fully-operable balcony doors and windows.

In addition, the Project would meet the City of Los Angeles, Green Building Code Requirements for parking facilities capable of supporting future electric vehicle supply equipment (EVSE), as well as parking spaces equipped with electric vehicle (EV) charging stations.

Furthermore, in accordance with CEQA Guidelines Appendix F, the EIR will provide further information as to energy conservation, energy implications, and the energy-consuming equipment and processes that would be used during Project construction and operation. Design features of the Project, energy supplies that would serve the Project, and total estimated daily vehicle trips that would be generated by the Project will also be analyzed. An analysis of the Project's consistency with Appendix F will also be provided in the EIR.

3.3.8 Anticipated Construction Schedule

Construction of the Project would commence with site clearance and demolition of the existing parking structure and parking lot, followed by grading and excavation for the subterranean levels. Building foundations would then be laid, followed by building construction, paving/concrete installation, and installation of landscaping and amenities. The Project would install new utility connections from existing public infrastructure to serve the Project. Project construction is anticipated to occur over a 36-month period and be completed in 2024. The estimated depth of excavation for the subterranean parking and building foundations would be approximately 63 feet below grade. It is estimated that approximately 89,750 cubic yards of soil would be exported and hauled from the Project Site during the excavation phase. Subject to LADOT approval, the primary construction haul route from the Project would travel north on Hope Street, east on 7th Street or Wilshire Boulevard, south on Grand Avenue, east on 18th Street, use the on-ramp at Los Angeles Street to I-10 East, and travel north on I-605 to a landfill facility. As part of the Project, a Construction Traffic Management Plan and Truck Haul Route Program would be implemented during construction to minimize potential conflicts between construction activity and through traffic. The Construction Traffic Management Plan and Truck Haul Route Program would be subject to LADOT review and approval.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Environmental Impact Report will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

1. Pursuant to **LAMC Section 14.5.6**, the Applicant requests approval of a Transfer of Floor Area Rights (TFAR) from one Donor Site to the Project Site (Receiver Site). The Donor Site, the Los Angeles Convention Center, will transfer 202,564 square feet under the Project with School Option or 196,327 square feet under the Project with No School Option to the Receiver Site. The Applicant requests the related Conditions of Approval be written to permit the flexibility to reduce the fee required, if the ultimate project floor area square footage is reduced.

2. Pursuant to **LAMC Section 16.05,** the Applicant requests that Site Plan Review Findings be made as part of this discretionary approval.

3. Pursuant to **LAMC Section 12.27,** the Applicant requests a Variance to provide 25 percent of the required residential parking stalls as compact stalls, in lieu of a minimum of one standard space for each residential unit.

4. Pursuant to **LAMC Section 12.21-G,3**, the Applicant requests a Director's Decision to allow a 10-percent reduction in the required area for planting of ground cover, shrubs, and trees to 15 percent of the common open space provided in lieu of 25 percent of the common open space provided.

5. Pursuant to **LAMC Section 12.21-A,2**, the Applicant requests a Zoning Administrator's Interpretation to allow tandem mechanical lift parking as proposed.

6. Pursuant to **LAMC Section 17.15**, the Applicant requests approval of Vesting Tentative Tract Map (Tract No. VTT-74876), to merge three (3) lots and re-subdivide the land into one ground lot and airspace lots for condominium purposes creating a mixed-use development consisting of either 547 residential dwelling units, 7,499 square feet of commercial/retail/restaurant space, and 37,216 square feet of space dedicated to a school use OR 580 residential dwelling units and 7,499 square feet of commercial/retail/restaurant space.

    a. The Applicant is requesting permission to deviate from the number of parking spaces defined in the Advisory Agency policy memo AA-2000-1. This memo requires 2.25 parking spaces per dwelling unit. The Applicant requests permission to provide 1 parking space per residential dwelling in consideration of the Site's proximity to jobs and public transit.

7. Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

INITIAL STUDY

4. ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[4]

PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. The analysis in this initial study (or in the EIR, if any aesthetic impact discussion is included), is for informational purposes only and not for determining whether the Project will result in significant impacts to the environment. Any aesthetic impact analysis in this initial study (or the EIR) is included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the aesthetic impact discussion in this initial study (or the EIR) shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures.

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4 City of Los Angeles Department of City Planning, Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed April 7, 2019.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

As described in Section 3, Project Description, of this Initial Study, the Project is a new mixed-use development that would include 547 residential dwelling units, up to 7,499 square feet of ground floor commercial/retail/restaurant space and 37,216 square feet dedicated to a school use. The Project also includes an option to construct 33 additional residential units in lieu of a school use, resulting in a total of 580 residential units. As such, pursuant to Senate Bill 743, the Project is considered a mixed-use residential project. In addition, the Project Site is located on an infill site as defined by PRC Section 21099. The Project Site is also located less than 0.5 mile from several bus lines and an existing major transit hub. Specifically, the Project Site is located approximately one block away from the Los Angeles County Metropolitan Transportation Authority's (Metro's) 7th/Metro Center Metro Rail station, which contains the Metro Red, Purple, Blue, and Expo Lines and is considered the hub of the regional rail network, connecting passengers to Pasadena, East Los Angeles, Long Beach, Culver City, Santa Monica, Hollywood, Korea Town, and North Hollywood. Additionally, Metro bus lines, including local and rapid lines, as well as Los Angeles Department of Transportation's (LADOT's) Commuter Express lines, run south along Grand Avenue, with the nearest stop midblock on Grand Avenue between 7th Street and 8th Street. Metro Lines 66 and 81, as well as LADOT's Commuter Express Lines 419, 431, 437 and 534 and Antelope Valley Transit Authority's (AVTA) Commuter Line 785, run west on 8th Street. LADOT's DASH Lines have stops within one block north on 7th Street and within one block west on Flower Street. The majority of these transit services provide a frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. As such, the Project is located in a TPA as defined in PRC 21099. The City's Zone Information and Map Access System (ZIMAS) also confirms the Project Site's location within a TPA, as defined in the City's Zoning Information File ZI No. 2452.[5] Thus, any aesthetic impacts that might be identified for the Project would not be considered significant impacts on the environment pursuant to PRC Section 21099. The following aesthetics discussion is provided for information purposes only. The discussion considers factors from the City's *L.A. CEQA Thresholds Guide*.

[5] City of Los Angeles, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018.

a. Have a substantial adverse effect on a scenic vista?

No Impact. A significant impact may occur if a project would have a substantial adverse effect on a scenic vista. As set forth in the *L.A. CEQA Thresholds Guide*, when analyzing aesthetic impacts, views generally refer to visual access to, or the visibility of, a particular sight from a given vantage point or corridor. "Panoramic" views are considered vistas and provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. Panoramic vistas are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views and vistas might include an urban skyline, valley, mountain range, the ocean, or other water bodies. In contrast, "focal views" focus on a particular object, scene, setting or feature of visual interest. Examples of focal views include natural landforms, public art/signs, individual buildings, such as historic buildings, and protected heritage or landmark trees. For purposes of this analysis, the Downtown Los Angeles skyline is considered a scenic resource and views of it are considered scenic vistas. This skyline is visible from several observation points throughout the City and beyond its boundaries. As described in the Project Description included as part of this Initial Study, the Project would develop a 45-story high-rise residential tower that would include residential units, commercial/retail/restaurant space and potentially a school. The Project Site, as it is currently occupied by a low-rise four-level parking structure and a surface parking lot, has minimal city views due to tall structures on adjacent parcels and the area's relatively flat topography. Distant panoramic views of downtown Los Angeles are available from a variety of vantage points in the Hollywood Hills to the north. From the area, however, scenic vistas of other visual resources, including the Hollywood Hills, are generally not available. As is the case under existing conditions, future views with implementation of the Project would continue to depict the highly urbanized downtown area. In addition, despite the increase in building height and density that would result from the Project, the Project Site would remain difficult to discern within the greater fabric of urban development. Rather, the Project would contribute to the downtown skyline views that are available from public rights-of-way and from the Hollywood Hills.

Pursuant to SB 743 and ZI No. 2452, the Project would result in no impact to scenic vistas. No further analysis of this topic in the EIR is required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. A significant impact may occur if a project would substantially damage scenic resources within a state scenic highway. The Project Site is not located in proximity to a state-designated or City-designated scenic highway or associated view corridor. In addition, the Project Site consists predominantly of paved surfaces devoid of landscaping. There are no unique geologic or topographic features located on the Project Site, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. The existing surrounding commercial structures are not considered scenic resources. As discussed further below, the Project Site does not include protected trees, and new street trees would be provided in accordance with City requirements. Pursuant to SB 743 and ZI No. 2452, the Project would result in no impact to scenic resources within a state scenic highway. No further analysis of this topic in the EIR is required.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The Project Site is located within the Central City Community Plan area of the City of Los Angeles, which is highly urbanized and largely built out with mid- and high-rise structures. As such,

this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality. The Project Site is designated for Regional Center Commercial by the Central City Community Plan and is zoned C2-4D (Commercial, Height District No. 4 with a Development Limitation ["D" Limitation]). As described in Section 3, Project Description, of this Initial Study, the Project proposes to construct a 45-story mixed-use project comprised of 562,696 square feet of floor area, with 547 residential dwelling units, up to 7,499 square feet of ground floor commercial/retail/restaurant space and 37,216 square feet dedicated to a school use (hereinafter referred to as the Project). The Project also includes an option wherein an additional 33 residential units may be constructed in lieu of the school use, resulting in a total of 580 residential units for the option. With approval of the Transfer of Floor Area Rights request, the Project would be consistent with the LAMC regulations related to height and massing. In addition, the Project would also be consistent with the Downtown Design Guide that focuses on the relationship of buildings to the street, including sidewalk treatment, character of the building as it adjoins the sidewalk, and connections to transit, as well as the City of Los Angeles Walkability Checklist.

Based on the above, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Pursuant to Senate Bill 743, Public Resources Code Section 21099, and Zoning Information File ZI No. 2452, the Project would result in no impact to scenic quality. No further analysis of this topic in the EIR is required.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. A significant impact may occur if a project would create a new source of light or glare which would adversely affect daytime or nighttime views in the area. In addition, according to the *L.A. CEQA Thresholds Guide*, a proposed project would have a significant shading impact if shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March) or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).

The Project Site is located within a highly urbanized area and is largely surrounded by tall structures on adjacent parcels. The existing parking structure and surface parking lot on the Project Site currently generate moderate levels of artificial light and glare typical of urbanized areas. Light sources include low-level security lighting, vehicle headlights, and street lighting. Glare sources include glass and metal building and vehicle surfaces. Other sources of light in the Project vicinity include pole-mounted street lights along the adjacent streets and signage and architectural lighting from nearby towers. In addition, given the abundance of high-rise buildings within the Project vicinity, substantial shading currently occurs within the Project vicinity.

Light and Glare

The Project would introduce new sources of light and glare that are typically associated with residential and commercial buildings, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Surrounding uses with views of the Project Site that are considered sensitive relative to nighttime light include residential uses. In the immediate Project vicinity, the nearest off-site receptors that are considered sensitive relative to daytime glare and have views of the Project Site are nearby residential uses, including those immediately to the southwest (8th+Hope), to the south (801 S. Grand Avenue) and to the east (8th and Grand), and motorists on surrounding streets.

Construction

In accordance with the provisions of LAMC Section 41.40, construction activities would occur between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. However, construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur in the evening hours during the winter season when daylight is no longer sufficient. Thus, there would be a negligible potential for nighttime glare associated with construction activities to occur. Furthermore, construction-related illumination would be used for safety and security purposes only and would be shielded and/or aimed so that no direct beam illumination is generated outside of the Project Site boundary. Therefore, construction activities would not result in a new source of substantial light to adversely affect nighttime views in the area.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations, where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. As such, construction activities would not result in a new source of substantial glare that would adversely affect daytime views in the area. Therefore, there would be a negligible potential for daytime glare associated with construction activities to occur.

Pursuant to SB 743 and ZI No. 2452, Project construction would result in no impact with respect to light or glare.

Operation

The Project would eliminate sources of glare associated with the existing surface parking lot. New sources of artificial lighting that would be introduced by the Project would include low-level interior lighting visible through the windows of the residential tower; signage lighting; architectural lighting on the building, including lighting associated with outdoor uses (e.g., roof decks) and activities; low-level security and wayfinding lighting; landscape lighting; and automobile headlights. New sources of glare would include building surfaces and Project-related vehicles.

The proposed lighting sources would be similar to other lighting sources in the Project vicinity and would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity during the day and night. All exterior lighting would meet all applicable LAMC lighting standards. As required by LAMC Section 93.0117(b), exterior light sources and building materials would not cause more than two (2) foot-candles of lighting intensity or generate direct glare from the light source at the following locations:

- Any exterior glazed windows or glass doors on any property containing residential units;
- Any elevated habitable porch, deck, or balcony on any property containing residential units; or
- Any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

In addition, low-level lighting to accent signage, architectural features, and landscaping elements would be incorporated throughout the Project Site. Project lighting would follow the streetscape lighting

standards as established by the Downtown Design Guide. All new street and pedestrian lighting within the public right-of-way would also comply with applicable City regulations and would be subject to approval by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways, while minimizing light and glare on adjacent properties.

As discussed above, Project signage would include mounted Project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage. In general, new signage would be architecturally integrated into the design of the building and would establish appropriate identification for the commercial, educational, and residential uses. In accordance with the LAMC (Chapter 1, Article 4.4, Section 14.4.4E), illumination used for Project signage would be limited to a light intensity of 3 foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

With regard to glare, the Project would be designed in a contemporary architectural style and would feature various surface materials. Building materials could include different types of glass, concrete, aluminum, and stone. In order to meet the requirements of Title 24, a high-performance coating is needed for the exterior glazing so as to obtain as much transparency as possible and to avoid the dark, heavily tinted windows of previous generations. The addition of the continuous balconies to the building design allows for greater exterior shading, resulting in increased visibility and reduced reflectivity in the coating compared to a similar building without balconies. The glass coating would be carefully selected in order to achieve as much transparency as possible within the limits of Title 24 with as low reflectivity as possible. Therefore, these materials would not have the potential to produce a substantial degree of glare. In addition, the proposed parking areas would be located either below-ground or screened from view above-ground, which would eliminate the reflection potential from parked cars as viewed from surrounding areas and roadways during the day and night and would substantially reduce lighting levels from vehicle headlights during the night. While headlights from vehicles entering and exiting the Project's driveways would be visible from the residential receptors immediately southwest, south, and east of the Project Site during the evening hours, such lighting sources would be typical for the Project area and would not be anticipated to result in a substantial adverse impact.

Lighting and glare associated with Project operation would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Pursuant to SB 743 and ZI 2452, Project operation would result in no impact with respect to light and glare. No further analysis of this topic in the EIR is required.

Shading

According to the *L.A. CEQA Thresholds Guide*, facilities and operations sensitive to the effects of shading include routinely usable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses, such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. As discussed above, according to the *L.A. CEQA Thresholds Guide*, a proposed project would have a significant shading impact if shadow sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March) or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).

As previously discussed, surrounding uses in the general vicinity of the Project Site include commercial and high density residential uses. Uses in the immediate vicinity of the Project Site include a parking structure for The Bloc to the west across Hope Street; the Sheraton Hotel and The Bloc to the northwest across Hope Street; parking structures, a small church (Christian Science Church—Third

Church of Christ, Scientist), and a mid-rise commercial building fronting 7th Street to the north within the same block as the Project Site; and a mid-rise apartment building (8th and Grand) to the northeast and east across Grand Avenue. Of these nearby uses, the routinely usable outdoor uses associated with hotel and residential uses would be considered most sensitive to shading. As shown in the shadow diagrams provided in Appendix IS-1 of this Initial Study, these and other shadow-sensitive areas within the vicinity of the Project Site would not be shaded for three hours or more between the hours of 9:00 A.M. and 3:00 P.M. during the winter or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. during the remaining seasons. Pursuant to SB 743 and ZI No. 2452, the Project would result in no impact with respect to shading. No further analysis of this topic in the EIR is required.

II. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project Site is located in an urbanized area of the City of Los Angeles. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently developed with a low-rise four-level parking structure and a surface parking lot. In addition, the uses surrounding the Project Site include commercial and residential uses. No agricultural uses or operations occur on-site or in the vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.[6,7] As such, the Project would not convert farmland to non-agricultural use, and no impacts would occur. No further analysis of this topic in the EIR is required.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned by the LAMC as C2-4D, which permits various commercial and residential uses. Furthermore, no agricultural zoning is present in the surrounding area, and the Project Site and surrounding area are not enrolled under the California Land Conservation Act often referred to as the Williamson Act Contract.[8] Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract, and no impacts would occur. No further analysis of this topic in the EIR is required.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As previously discussed, the Project Site is located in an urbanized area and is currently developed with a low-rise four-level parking structure and a surface parking lot. The Project Site does not include any forest or timberland. In addition, the Project Site is currently zoned for commercial and residential land uses. The Project Site is not zoned for or used as timberland or forest land.[9] Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the PRC, and no impacts would occur. No further analysis of this topic in the EIR is required.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As previously discussed, the Project Site is located in an urbanized area and does not include any forest land or timberland. Therefore, the Project would not result in the loss or conversion

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6 California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2016, map published July 2017.

7 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018.

8 California Department of Conservation, Division of Land Resource Protection, Los Angeles County Williamson Act FY 2015/2016, map published 2016.

9 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018.

of forest land to non-forest use, and no impacts to forest land would occur. No further analysis of this topic in the EIR is required.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As described above, the Project Site is located within an urbanized area and does not include farmland. The Project Site and surrounding area are not mapped as farmland, are not zoned for farmland or agricultural use, and do not contain any agricultural uses.[10] As such, the Project would not result in the conversion of farmland to non-agricultural use, and no impacts would occur. No further analysis of this topic in the EIR is required.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,700-square-mile South Coast Air Basin (Air Basin). Pursuant to the federal and state Clean Air Acts, within the Air Basin, the South Coast Air Quality Management District (SCAQMD) is required to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment (i.e., ozone [O_3], particulate matter less than 2.5 microns in size [$PM_{2.5}$], particulate matter less than 10 microns in size [PM_{10}], and lead[11]). The SCAQMD's 2016 Air Quality Management Plan (AQMP) contains a comprehensive list of pollution control

[10] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018.

[11] Partial Nonattainment designation for lead for the Los Angeles County portion of the Air Basin only.

strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.[12] With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based on growth projections in local general plans for jurisdictions in SCAG's planning area.

Construction and operation of the Project may result in an increase in stationary and mobile source air emissions. As a result, development of the Project could have a potential adverse effect on the SCAQMD's implementation of the AQMP. Therefore, the EIR will provide further analysis of the Project's consistency with the SCAQMD's AQMP.

With regard to the Project's consistency with the Congestion Management Program (CMP) administered by Metro, see Response to Checklist Question XVII.b, Transportation, below.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. Construction and operation of the Project would result in the emission of air pollutants in the Air Basin. The Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Construction-related pollutants would be associated with sources such as construction worker vehicle trips, the operation of construction equipment, demolition of existing buildings, site grading and preparation activities, trucks exporting demolition debris or soil and the application of architectural coatings. During Project operation, air pollutants would be emitted on a daily basis from motor vehicle travel, energy consumption, and other on-site activities. As discussed above, the Air Basin is currently in non-attainment of federal air quality standards for ozone and $PM_{2.5}$ and partial non-attainment for lead. The Air Basin is also in non-attainment of state air quality standards for ozone, $PM_{2.5}$, and PM_{10}. Thus, implementation of the Project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Air Basin. Therefore, the EIR will provide further analysis of cumulative air pollutant emissions associated with the Project.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As discussed above, the Project would result in increased air pollutant emissions from the Project Site during construction (short-term) and operation (long-term). Sensitive receptors located in the vicinity of the Project Site include residential uses. To the east of the Project Site is a mid-rise residential complex (i.e., Eighth & Grand) with a ground floor market. To the south, southeast, and southwest are high-rise and mixed-use residential towers, including 8th+Hope immediately to the southwest, two mixed-use high-rise buildings at 801 S. Grand Avenue and 888 S. Hope Street, and three other high-rise residential towers (i.e., Atelier, 845 S. Olive Street Tower, and 820 S. Olive Street Tower) to the southeast on Olive Street between 8th Street and 9th Street. Therefore, the EIR will provide further analysis of the Project's potential to result in substantial adverse impacts to sensitive receptors.

[12] SCAG serves as the federally designated metropolitan planning organization (MPO) for the Southern California region.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No objectionable odors are anticipated as a result of either construction or operation of the Project. Construction of the Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to Project operation, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. The proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions.[13] In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401 and 403 regarding visible emissions violations.[14] Construction and operation of the Project would also comply with SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.[15]

Based on the above, the Project would not result in other emissions affecting a substantial number of people. Impacts during construction and operation of the Project would be less than significant. No further analysis of this topic in the EIR is required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

[13] SCAQMD, Rule 1138, Control of Emissions from Restaurant Operations.

[14] SCAQMD, Visible Emissions, Public Nuisance & Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed August 17, 2018.

[15] SCAQMD, Rule 402, Nuisance.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area and is currently developed with a low-rise four-level parking structure and a surface parking lot. One street tree is situated along Hope Street, and six street trees line the sidewalk along 8th Street; the Project Site does not contain any other landscaping. According to the Native Tree Protection Report prepared for the Project and included as Appendix IS-2 of this Initial Study, none of the trees along Hope Street and 8th Street are native or protected species. Due to the developed nature of the Project area and the lack of open space areas, species likely to occur on-site and the Project area are limited to small terrestrial and avian species typically found in developed settings. Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area as defined by the City of Los Angeles.[16] Thus, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS), and, as such, no impacts would occur. No further analysis of this topic in the EIR is required.

[16] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1B, Biological Resource Areas, p. 2.18-4.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project Site is located in an urbanized area and is developed with a low-rise four-level parking structure and a surface parking lot. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area.[17,18,19] Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.[20,21] Thus, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, and, as such, no impacts would occur. No further analysis of this topic in the EIR is required.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Site is located in an urbanized area and is currently developed with a low-rise four-level parking structure and a surface parking lot. No water bodies or federally protected wetlands, as defined by Section 404 of the Clean Water Act, exist on the Project Site or in the vicinity.[22] As such, the Project would not have any effect on state or federally protected wetlands, and no impacts would occur. No further analysis of this topic in the EIR is required.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. As discussed above, the Project Site is located in an urbanized area and is developed with a low-rise four-level parking structure and a surface parking lot. There are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity.

One street tree is situated along Hope Street, and six street trees line the sidewalk along 8th Street. No other trees are present within the Project Site. According to the Native Tree Protection Report prepared for the Project and included as Appendix IS-2 of this Initial Study, none of the trees along Hope Street and 8th Street are native or protected species. During construction, the removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. To the extent

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17 California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), https://map.dfg.ca.gov/bios/, accessed August 17, 2018.

18 California Department of Fish and Wildlife, CDFW Lands, https://map.dfg.ca.gov/lands/, accessed August 17, 2018.

19 United States Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed August 17, 2018.

20 City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure BR-1B, Biological Resource Areas, p. 2.18-4.

21 Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, 2015.

22 United States Environmental Protection Agency, https://nepassisttool.epa.gov/nepassist/nepamap.aspx, accessed August 17, 2018.

that vegetation removal activities must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If any active nests are detected, the area would be flagged with a buffer (ranging between 50 and 300 feet, as determined by the monitoring biologist), and the area would be avoided until the nesting cycle has been completed or the monitoring biologist has determined that the nest has failed. With compliance with this existing regulatory requirement, impacts to nesting and migratory birds would be less than significant. No further analysis of this topic in the EIR is required.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), Southern California Black Walnut, Western Sycamore, and California Bay Laurel trees of at least 4 inches in diameter at breast height. These tree species are defined as "protected" by the City of Los Angeles. Trees that have been planted as part of a tree planting program are exempt from this ordinance and are not considered protected. The Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree..." and requires that each protected tree removed is replaced by at least two trees of a protected variety (i.e., 2:1 basis).

As discussed above, one street tree is situated along Hope Street, and six street trees line the sidewalk along 8th Street. No other trees are present within the Project Site. According to the Native Tree Protection Report prepared for the Project and included as Appendix IS-2 of this Initial Study, none of the trees along Hope Street and 8th Street are native or protected species. Additionally, existing street trees would be replaced at a ratio of 2:1 in accordance with City of Los Angeles Urban Forestry Division Requirements. Removal of all street trees located within the public right-of-way will require approval from the Board of Public Works. In addition, in accordance with LAMC requirements, a total of 137 new trees would be planted within the Project Site. The new tree species would be drought-tolerant and/or climate-adapted nature. Thus, the planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. Therefore, impacts related to conflict with any local policies or ordinances protecting biological resources would be less than significant. No further analysis of this topic in the EIR is required.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is located in an urbanized area and is currently developed with a low-rise four-level parking structure and a surface parking lot. As previously described, the Project Site is devoid of any landscaping. There are seven ornamental street trees along 8th Street and Hope Street. The Project Site does not support any habitat or natural community. Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site.[23] Thus, the Project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other related plans, and no impact would occur. No further analysis of this topic in the EIR is required.

[23] California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Less Than Significant Impact. Section 15064.5 of the CEQA Guidelines generally defines a historical resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources (California Register); (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the PRC); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the PRC). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register. The local register of historical resources is managed by the City of Los Angeles Office of Historic Resources (OHR), which manages SurveyLA, a comprehensive program to identify significant historic resources throughout the City.

The Project Site is currently developed with a low-rise four-level parking structure and a surface parking lot and does not contain any historic resources. In addition, a review of the City's Historical Cultural Monuments List was conducted, which did not identify any historical cultural monuments adjacent to the Project Site. However, in the northern portion of the block containing the Project Site, fronting along 7th Street, is the Boston Store–J.W. Robinson's Building, which is a designated City Historic-Cultural Monument (HCM #357).[24] However, this building is located approximately 250 feet north of the Project Site and is physically separated from the Project Site by a 5-level parking structure along Grand Avenue and an 8-story parking structure and a small church (Christian Science Church—Third Church of Christ, Scientist) along Hope Street. Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5, and potential impacts to historical resources would be less than significant. No further analysis of this topic in the EIR is required.

[24] City of Los Angeles Department of City Planning, Historic-Cultural Monument (HCM) List, City Declared Monuments, April 3, 2018, p. 15.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant With Mitigation Incorporated. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is located within a highly urbanized area and has been subject to grading and development in the past. As provided in Appendix IS-3 of this Initial Study, the records search conducted for the Project Site by the South Central Coastal Information Center (SCCIC) indicates that there is a known archaeological resource within a 0.5-mile radius of the Project Site.[25]

Given that the maximum depth of excavation for Project development would be approximately 63 feet below the existing ground surface, there is a possibility that archaeological artifacts that were not recovered during prior construction or other human activity may be present. As set forth in Mitigation Measure CUL-MM-1, a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event archaeological materials are encountered, the archaeologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The implementation of Mitigation Measure CUL-MM-1 would ensure that any potential impacts related to archaeological resources would be less than significant. No further analysis of this topic in the EIR is required.

Mitigation Measure CUL-MM-1: Prior to the start of ground-disturbing activities, the Applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior 2008) to carry out the following measure. A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As discussed above, the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional burial sites have been identified on the Project Site. While the uncovering of human remains is not anticipated, if human remains are discovered during construction, such resources would be treated in accordance with

[25] The SCCIC records search is included as Appendix IS-3 of this Initial Study.

state law, including Section 15064.5 of the CEQA Guidelines, Section 5097.98 of the PRC, and Section 7050.5 of the California Health and Safety Code (HSC). Specifically, if human remains are encountered, work on the portion of the Project Site where remains have been uncovered would be suspended and the City of Los Angeles Public Works Department, and the County Coroner would be immediately notified. If the remains are determined by the County Coroner to be Native American, the Native American Heritage Commission (NAHC) would be notified within 24 hours, and the guidelines of the NAHC would be adhered to in the treatment and disposition of the remains. Compliance with the regulatory standards described above would ensure appropriate treatment of any potential human remains unexpectedly encountered during grading and excavation activities. Therefore, the Project's impact on human remains would be less than significant. No further analysis of this topic in the EIR is required.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☒	☐	☐	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☒	☐	☐	☐

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. As discussed in Section 3, Project Description, of this Initial Study, the Project Site is currently occupied by a surface parking lot and four-level parking structure. The Project would develop 547 residential dwelling units, up to 7,499 square feet of ground floor commercial/retail/restaurant space, and approximately 37,216 square feet dedicated to a school use. The Project also includes an option to provide 33 additional residential units in lieu of providing the school use, resulting in a total of 580 residential units for the option. Therefore, the Project would generate an increased demand for electricity and natural gas services provided by the Los Angeles Department of Water and Power and the Southern California Gas Company, respectively. While development of the Project would not be anticipated to cause wasteful, inefficient, and unnecessary consumption of energy resources, further analysis of the Project's use of existing energy resources will be provided in the EIR.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. First established in 2002 under Senate Bill 1078, California's Renewable Portfolio Standards require retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020.[26] The Los Angeles Department of Water and Power (LADWP) provides electrical service throughout the City and many areas of the Owens Valley. LADWP generates power from a variety of energy sources, including hydropower,

[26] CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/RPS_Homepage/, accessed February 6, 2019.

coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. In accordance with Senate Bill 1078, LADWP is required to procure at least 33 percent of its energy portfolio from renewable sources by 2020.

Regarding energy efficiency, the California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality. The current California Building Energy Efficiency Standards (Title 24 standards) are the 2016 Title 24 standards, which became effective on January 1, 2017.[27] The 2016 Title 24 standards include efficiency improvements to the residential standards for attics, walls, water heating, and lighting and efficiency improvements to the non-residential standards include alignment with the American Society of Heating and Air-Conditioning Engineers *(*ASHRAE) 90.1 2013 national standards.[28]

The Project Site does not include any renewable energy sources used by LADWP. In addition, as discussed in Section 3, Project Description, of this Initial Study, the Project has been designed and would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. While the Project would not be anticipated to conflict with or obstruct a state or local plan for renewable energy or energy efficiency, the Project's compliance with LADWP's plans for renewable energy as well as the Project's compliance with California Building Energy Efficiency Standards will be further evaluated in the EIR.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

[27] CEC, 2016 Building Energy Efficiency Standards, www.energy.ca.gov/title24/2016standards/, accessed February 6, 2019.

[28] CEC, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, June 2015.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist–Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist–Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. Additionally, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

Based on the Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study, the Project Site is not within a currently established Alquist–Priolo Earthquake Fault Zone. In addition, as discussed in detail in the Geotechnical Report, the Project Site is not located within a

City-designated Fault Rupture Study Area.[29] While the closest active fault is the Puente Hills Blind Thrust, which is located approximately 0.45 mile of the Project Site, no active or potentially active faults underlie the Project Site.[30] Therefore, the potential for surface ground rupture at the Project Site due to faulting beneath the Project Site during the life of the proposed development is considered low, and the Project would not exacerbate existing fault rupture conditions. In addition, compliance with the existing state and local regulations, including the 2016 California Building Code and the City of Los Angeles Building Code, would ensure the Project is consistent with applicable seismic design criteria and with existing seismic safety regulations. The Project would ensure that structures are built to a level that withstands acceptable seismic risk. Therefore, the Project would not directly or indirectly cause substantial adverse effects associated with fault rupture and would not cause or exacerbate seismic conditions at the Project Site, and, as such, impacts would be less than significant. No further analysis of this topic in the EIR is required.

ii. Strong seismic ground?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults. As discussed above, the closest active fault is the Puente Hills Blind Thrust, which is located approximately 0.45 mile from the Project Site. The potentially significant impacts related to seismic ground shaking at the Project Site would not be exacerbated by the Project because the Project would not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that would exacerbate ground shaking. Furthermore, as discussed above, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, impacts associated with seismic ground shaking would be less than significant.

The following discussion about building and seismic codes is provided for informational purposes. Engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. As discussed in detail below, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. The Geotechnical Report contains preliminary recommendations for the type of engineering practices that would be used. Additionally, a final design-level geotechnical report will be prepared by the Project Applicant and reviewed to the satisfaction of the City of Los Angeles Department of Building and Safety (LADBS) before the issuance of grading permits. The final recommendations from that report will be enforced for the construction of the Project. Based on the Geotechnical Report, the Project Site is suitable for development, and the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site. As with other development projects in the Southern California region, the Project would comply with the Los Angeles Building Code (LABC), which incorporates current seismic design provisions of the 2016 California Building Code with City amendments. The 2016 Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. The LADBS is responsible for implementing the provisions of the LABC. The Project would also be required to comply with the plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report. In addition, the state and City mandate compliance with

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[29] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018.

[30] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018.

numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the LABC. Pursuant to those laws, the Project must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Site. Therefore, impacts associated with seismic ground shaking would be less than significant. No further analysis of this topic in the EIR is required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low density, fine, clean, sandy soils; and strong ground motion. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

The Project Site is not located within a liquefaction zone as classified by the State of California.[31] Similarly, the City of Los Angeles does not identify the Project Site in an area that is susceptible to liquefaction.[32] According to the Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study, during the exploratory borings conducted for the investigation, groundwater was encountered at a depth of 130 feet below the existing site grade. The historically highest groundwater level was also found to be approximately 70 feet below the existing site grade. Based on the dense nature of the underlying soils and depth to the historically highest groundwater level, the potential for liquefaction at the Project Site is considered to be remote. Thus, the Project would not directly or indirectly cause substantial adverse effects associated with liquefaction, and the Project would not exacerbate existing conditions with regard to seismic ground failure, including liquefaction. Therefore, impacts would be less than significant. No further analysis of this topic in the EIR is required.

iv. Landslides?

No Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site and surrounding area are fully developed and characterized by relatively flat topography. The Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study confirms the general lack of elevation difference across or adjacent to the Project Site. In addition, the Project Site is not located in a landslide area as mapped by the State of California.[33] Furthermore, the Project Site is not mapped as a landslide area by the City of Los Angeles.[34,35] The Project Site would remain flat and would not cause landslides. Therefore, the Project would not exacerbate existing conditions that would directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. As such, no impact would occur. No further analysis of this topic in the EIR is required.

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31 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed August 17, 2018.

32 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018.

33 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed August 17, 2018.

34 City of Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, p. 51.

35 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Development of the Project would require grading and excavation and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. Although Project construction would have the potential to result in the erosion of soils, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. In addition, on-site grading and site preparation would comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills. Regarding soil erosion during Project operations, the potential is relatively low since the Project Site would be fully developed and/or landscaped. Therefore, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant. No further analysis of this topic in the EIR is required.

c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. As discussed above, the Project Site is not located near slopes or geologic features that would result in on- or off-site landsliding or lateral spreading. Additionally, as discussed in greater detail in Response to Checklist Question VI.a.iii above, based on the depth to groundwater, subsidence and liquefaction are unlikely at the Project Site. Therefore, the Project would not exacerbate existing conditions with regard to geologic or soil stability, and impacts with respect to geologic or soil stability would be less than significant. No further analysis of this topic in the EIR is required.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The Project Site consists of 3 to 6 feet of existing fill material with alluvium soils found below. The fill primarily is comprised of silty sand and sandy silt. The deeper alluvium below is comprised of sand, occasional gravel, and some clayey to sandy silt, and are dense to very dense. The Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study identifies the on-site geologic materials near surface soils to be in the moderate expansion range and the deeper materials in the infiltration zone to be in the low expansion range. As the Project would require excavation to a depth of 63 feet below ground surface to accommodate the proposed subterranean levels, the Project would remove soils in the moderate expansion range. Furthermore, construction of the Project would be required to comply with the current California Building Code and supplemental requirements of the LAMC, as enforced by the City of Los Angeles. These requirements would include building foundation and other requirements appropriate to site-specific conditions that would be provided in accordance with the design level geotechnical investigation required by the City. Thus, the Project would not create substantial direct or indirect risks to life or property with regard to expansive soil, and impacts with respect to expansive soils would be less than significant. No further analysis of this topic in an EIR is required.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located within a community served by existing sewer infrastructure. The Project's wastewater demand would be accommodated via connections to the existing

wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems. No further analysis of this topic in the EIR is required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant With Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this era are extinct. As provided in Appendix IS-5 of this Initial Study, according to the paleontological resources records search conducted for the Project by the Los Angeles County Natural History Museum, no vertebrate fossil localities lie directly within the Project Site boundaries.

The Project Site is underlain by surface deposits that are composed of younger and older Quaternary Alluvium. These younger Quaternary deposits usually do not contain significant fossil vertebrates, at least in the uppermost layers, but the underlying older sedimentary deposits found at varying depths may contain significant vertebrate fossils. Just west of the Project Site, immediately east of the Harbor Freeway (I-110), there are exposures of older Quaternary Alluvium. Just to the north at about 6th Street, there are exposures of the marine latest Miocene Fernando Formation.

There are several localities nearby from the same sedimentary deposits that occur subsurface in the Project Site. The closest vertebrate-fossil locality from the older Quaternary deposits is LACM 1755, which is located just southwest of the Project Site near the intersection of Hill Street and 12th Street. This locality produced a fossil specimen of horse, *Equus,* at a depth of 43 feet below the surface. The next closest vertebrate fossil locality from older Quaternary deposits is likely LACM 6204, west-northwest of the Project Site near the intersection of Wilshire Boulevard and Serrano Avenue. This locality produced a fossil specimen of mammoth, *Mammuthus*, at unknown depth. In addition, west-southwest of the Project Site and in a cut for the Santa Monica Freeway (I-10) just east of Gramercy Place, the vertebrate fossil locality LACM 1893 in older Quaternary deposits produced fossil specimens of mammoth, *Mammuthus*, and bison, *Bison antiquus*.

The closest vertebrate fossil locality from the Fernando Formation is LACM 6971, which is located just northeast of the Project Site and west of Pershing Square near the corner of 6th and Flower Streets. The locality LACM 4726 is located farther east of LACM 6971 at the corner of 4th and Hill Street and is also from the Fernando Formation. Farther east-northeast of the Project Site near the intersection of Main and 2nd Streets is an additional Fernando Formation locality LACM 7730. These localities together have produced a composite fauna from the Fernando Formation including fossil specimens of stingray, *Dasyatis*, eagle ray, *Myliobatis*, skate, *Raja*, chimaerid, *Chimaeriformes*, bull shark, *Carcharhinus leucas*, dusky shark, *Carcharhinus obscurus*, hammerhead shark, *Sphyrna*, sixgill shark, *Hexanchiformes*, bonito shark, *Isurus oxyrinchus*, salmon shark, *Lamna ditropis*, white sharks, *Carcharodon sulcidens* and *Carcharodon carcharias*, herring, Clupeidae, hake, *Merluccius*, sheepshead, *Semicossyphus*, mackerel, *Scomber*, bird, *Aves*, rorqual baleen whale, *Balaenopteridae*, and toothed whale, *Odontoceti*.

As concluded by the vertebrate paleontology records search of the Los Angeles County Natural History Museum, shallow excavations in the younger Quaternary Alluvium exposed throughout the Project Site are unlikely to uncover significant fossil vertebrate remains. Deeper excavations in the Project Site that extend into the older sedimentary deposits, however, may encounter significant vertebrate fossils. Although the Project Site has been previously graded and developed, the Project would result in

excavations on the Project Site up to 63 feet below existing grade. As such, it may be possible that deeper-lying paleontological artifacts that were not recovered during prior construction or other human activity may be present. Thus, as detailed in Mitigation Measure GEO-MM-1 below, a qualified paleontologist would be retained to perform periodic inspections of excavation and grading activities. In the event that paleontological materials are encountered, the qualified paleontologist would temporarily halt development activity to assess and evaluate the discovered material(s). The certified paleontologist would provide recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. Therefore, with implementation of this mitigation measure, potential impacts to any previously undiscovered paleontological resources would be reduced to less than significant. Impacts to paleontological resources would be less than significant with mitigation incorporated.

The Project Site is currently developed with a surface parking lot and a low rise parking structure. There are no unique geologic features on the Project Site. Therefore, the Project would not directly or indirectly destroy a unique geologic feature.

Mitigation Measure GEO-MM-1: A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Project Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHG) since they have effects that are analogous to the way in which a greenhouse retains heat.

GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates Earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for GHG emissions in California. Activities associated with the Project, including construction and operational activities, would generate GHG emissions. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts related to GHG emissions.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. As the Project would have the potential to emit GHG emissions, further analysis of this topic in the EIR is required to identify Project-related emissions and associated emissions reduction strategies to determine whether the Project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG (e.g., Assembly Bill [AB] 32, City of Los Angeles Green Building Code, and SCAG's RTP/SCS).

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The following analysis is based, in part, on the *Environmental Site Assessment—Phase I and Screening Subsurface Assessment—Phase II* (Phase I and II Report) prepared for the Project by California Environmental Geologists & Engineers, Inc., dated February 2017. All specific information on historic and existing on-site conditions in the discussion below is from this report unless otherwise noted. This report is included as Appendix IS-6 of this Initial Study.

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for residential, educational, and commercial uses, including vehicle fuels, paints, oils, and transmission fluids. Similarly, the types and amounts of hazardous materials used during operation of the proposed residential, educational and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products. However, all potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in accordance with all applicable standards and regulations, including but not limited to, those set forth by the federal and State Occupational Safety and Health Acts. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Through compliance with these standards and regulations, any associated risk would be reduced to a less-than-significant level. No further analysis of this topic in the EIR is required.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. The Phase I and II Report included a review of environmental records for the Project Site and a site reconnaissance to identify potential on-site hazards. As discussed therein, the Project Site consists of a parking structure constructed in 1970 and an asphalt paved parking lot.

At the time of the site reconnaissance, there was no evidence of significant hazardous substance use on the Project Site. In addition, there was no evidence of aboveground storage tanks (ASTs), underground storage tanks (USTs), any containers of hazardous or unidentified substances, on-site disposal or landfill of solid waste, polychlorinated biphenyls (PCBs), heating and cooling equipment, wastewater treatment or disposal systems, or wells (i.e., dry wells irrigation wells, injection wells, abandoned wells, monitoring wells, etc.). There was no evidence of pits, ponds, lagoons, unusual odors, or stressed vegetation. Although minor oil staining was observed on the Project Site, there was no evidence of significant staining or residue.

Due to the age of the parking structure currently located on the Project Site, the Phase I and II Report recommended that an asbestos survey be conducted by a certified asbestos consultant prior to demolition. It is also possible that lead-based paint was utilized on-site. In the event any suspect asbestos-containing materials or lead-based paint coatings are found, the Project would adhere to all federal, state, and local regulations prior to their removal. Mandatory compliance with applicable federal and state standards and procedures would reduce associated risks to less-than-significant levels.

The current uses of the Project Site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal, or generation of significant quantities of hazardous substances or petroleum products. As described above, there was no evidence or record of USTs and ASTs. In the event an undocumented UST is identified on-site, it would be appropriately documented and removed according to Los Angeles Fire Department (LAFD) regulations. The Project Site is located within a Methane Buffer Zone identified by the City.[36] Prior to construction, methane testing would be conducted adhering to LADBS regulations. In the event methane levels exceed acceptable levels, appropriate design measures will be identified in accordance with the methane seepage regulations contained in the LAMC (Chapter 9, Article 1, Division 71, Section 91.7104) and included in the Project's design.[37] Therefore, there would be a negligible risk of subsurface methane release. No other recognized environmental concerns or historic recognized environmental concerns were identified on the Project Site.

Based on the above, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment, and, as such, impacts would be less than significant. No further analysis of this topic in the EIR is required.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are no public school sites located within a 0.25-mile radius of the Project Site. The Miguel Contreras Learning Complex is located approximately 0.75 mile northwest of the Project Site at 322 Lucas Avenue. John H. Liechty Middle School is located approximately 0.80 mile northwest of the Project Site at 650 South Union Avenue. Ninth Street Elementary School is located approximately 0.87 mile southeast of the Project Site at 835 Stanford Avenue. In addition, as discussed above, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used during construction of residential, educational, and commercial developments, including vehicle fuels, paints, oils, and transmission fluids.

One of the Project options includes a school component. Project operation would involve the limited use of hazardous materials typically used in the maintenance of office, school and commercial/retail/restaurant uses (e.g., cleaning solutions, solvents, painting supplies, and petroleum products). Therefore, the types of potentially hazardous materials that would be used in connection with the Project would be consistent with other potentially hazardous materials currently used in the vicinity of the Project Site. The Project would not involve the use or handling of acutely hazardous materials, substances, or waste. Furthermore, all materials during both the construction and operation of the Project would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations including, but not limited to, federal and State Occupational Safety and Health Act requirements discussed above in Response to Checklist Question IX.a. As such, the use of such

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[36] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018.

[37] Methane seepage regulations adopted by Ordinance No. 175,790, February 2004.

materials would not create a significant hazard to schools, and impacts would be less than significant. No further analysis of this topic in the EIR is required.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

Less Than Significant Impact. Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, state response sites, voluntary cleanup sites, and school cleanup sites.

The Project Site is not identified on the standard environmental government lists researched as part of the Phase I and II Report, including those compiled pursuant to Government Code Section 65962.5. The nearest listed contaminated site to the Project Site is greater than 450 feet northeast of the Project Site at 600 W. 7th Street and is a case that has been closed in 1995 regarding a leaking UST site. A release of diesel fuel at this off-site property affected soil only. It is unlikely the soil or groundwater beneath the Project Site is impacted by this off-site property.

As part of the Phase I and II Report, soil gas and soil samplings were completed at the Project Site. There was no evidence of an on-site release of total petroleum hydrocarbons (TPH) and/or volatile organic compounds (VOCs). All Title 22 metals in the soil were found to be at natural background concentrations. The sporadic detections of VOCs in soil gas do not pose a vapor intrusion hazard for the proposed structure with subterranean parking using the current CalEPA accepted risk analysis. The soil test data indicate that unrestricted reuse and off-site transfer of excavated soil is acceptable.

As discussed above, Project operation would involve the limited use of hazardous materials typically used in the maintenance of office and commercial/retail/restaurant uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). All potentially hazardous materials to be used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations.

Based on the above, the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not have the potential to exacerbate current environmental conditions to create a significant hazard, and, as such, impacts would be less than significant. No further analysis of this topic in the EIR is required.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The Project Site is not located within 2 miles of an airport or within an airport planning area. The nearest airport is the Los Angeles International Airport (LAX) located approximately 10.5 miles

southwest of the Project Site. Given the distance between the Project Site and LAX, the Project would not have the potential to exacerbate current environmental conditions that would result in a safety hazard or excessive noise. Therefore, no impact would occur. No further analysis of this topic in the EIR is required.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the Safety Element of the City of Los Angeles General Plan and County of Los Angeles Department of Public Works, the nearest designated disaster route to the Project Site is Figueroa Street, approximately 870 feet to the west.[38,39] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access.

Operation of the Project would generate traffic in the Project vicinity and would result in some modifications to site access. However, the Project would comply with LAFD access requirements and would not impede emergency access within the Project vicinity. Therefore, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan, and, as such, impacts related to the implementation of the City's emergency response plan would be less than significant. No further analysis of this topic in the EIR is required.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The Project Site is located in an urbanized area without wildlands in its vicinity. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone[40] or a City-designated fire buffer zone.[41] Furthermore, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. In addition, the proposed residential, educational, and commercial uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not expose people or structures, directly or indirectly, to a significant risk of loss, injury, or death as a result of exposure to wildland fires, and, as such, no impact would occur. No further analysis of this topic in the EIR is required.

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38 Los Angeles General Plan Safety Element, November 1996, Exhibit H, Critical Facilities and Lifeline Systems, p. 61.

39 County of Los Angeles Department of Public Works, Disaster Route Maps, City of Los Angeles Central Area, August 2008.

40 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

41 City of Los Angeles General Plan Safety Element, November 1996, Exhibit D, Selected Wildfire Hazard Areas, p. 53.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. As provided by the following analysis, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

Surface Water Quality

Construction

During Project construction, particularly during the excavation and grading phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce

airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, Project-related construction activities could have the potential to result in adverse effects on water quality. However, this potential would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion to acceptable levels. Additionally, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Article 1, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Therefore, with compliance with National Pollutant Discharge Elimination System (NPDES) requirements and City of Los Angeles grading permit regulations, Project construction would not violate any surface water quality standards or waste discharge requirements, and, as such, impacts to surface water quality during construction would be less than significant. No further evaluation of this topic in an EIR is required.

Operation

During operation, the Project would introduce sources of potential stormwater pollution that are typical of residential, school, and commercial developments (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with parking and circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, in accordance with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), Best Management Practices (BMPs) would be implemented on-site to address City and state water quality requirements. To this end, BMPs would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. The Hydrology and Water Quality Memo prepared for the Project and included as Appendix IS-7 concluded that BMPs would be implemented to control pollutants associated with stormwater runoff in compliance with the LID Ordinance. The proposed landscaping would reduce the quantity and improve the quality of stormwater runoff generated on the Project Site. Based on the Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study, on-site infiltration would be feasible. As discussed in the Hydrology and Water Quality Memo, this system would include infiltration drywells that would be strategically placed so as not to significantly impact the environment or existing infrastructure. A combination system may also be permitted to meet LID requirements. With implementation of the required BMPs, Project operation would not violate any surface water quality standards or waste discharge requirements. As such, impacts to surface water quality during operation would be less than significant. No further analysis of this topic in the EIR is required.

Groundwater Quality

Construction

According to the Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study, the historically highest groundwater level was found to be approximately 70 feet below the existing ground surface, and groundwater was encountered at a depth of 130 feet below the existing ground surface. As grading would consist of excavation to a maximum depth of 63 feet, it is not anticipated that Project construction would require dewatering or other groundwater withdrawals. Thus, Project construction would not decrease groundwater supplies or interfere with groundwater recharge. As discussed above in Response to Checklist Question IX, there was no evidence of aboveground storage tanks (ASTs), underground storage tanks (USTs), any containers of hazardous or unidentified substances, on-site disposal or landfill of solid waste, polychlorinated biphenyls (PCBs), heating and cooling equipment, or wastewater treatment or disposal systems. In addition, the soil test data indicate that unrestricted reuse and off-site transfer of excavated soil is acceptable. As such, the Project would not create a significant hazard to groundwater quality.

In addition, as previously discussed in Response to Checklist Question IX.a, during on-site grading and building construction, hazardous materials, such as vehicle fuels, paints, oils, and transmission fluids, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes during construction could increase the potential for hazardous materials to be released into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste would reduce the potential for the construction of the Project to release contaminants into groundwater. In addition, as described in the Phase I and II Report included as Appendix IS-6 of this Initial Study, there is no evidence of dry wells, irrigation wells, injection wells, abandoned wells, monitoring wells, or other wells on the Project Site. Thus, construction activities would not be anticipated to affect existing wells.

Based on the above, construction of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. Therefore, construction-related impacts on groundwater quality would be less than significant, and no further evaluation of this topic in an EIR is required.

Operation

Operational activities which could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks (USTs). Surface spills from the handling of hazardous materials most often involve small quantities and are cleaned up in a timely manner, thereby resulting in little threat to groundwater. Other types of risks such as leaking underground storage tanks have a greater potential to affect groundwater. However, the Project would not introduce any new USTs that would have the potential to expose groundwater to contaminants. In addition, the Project would comply with all applicable existing regulations that would prevent the Project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. Therefore, operation of the Project would not result in discharges that would violate any groundwater quality standard or waste discharge requirements. The Project's potential impact on groundwater quality during operation would be less than significant, and no mitigation measures are required. No further analysis of this topic in an EIR is required.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. As discussed above, according to the Geotechnical Report prepared for the Project and included as Appendix IS-4 of this Initial Study, the historically highest groundwater level was found to be approximately 70 feet below the existing ground surface. During the exploratory borings for the geotechnical investigation conducted for the Project Site, groundwater was encountered at a depth of 130 feet below the existing ground surface. Grading would consist of excavation to a maximum of 63 feet below the existing ground surface. Therefore, it is not anticipated that Project construction would require dewatering or other withdrawals of groundwater. Project construction would not decrease groundwater supplies or interfere with groundwater recharge.

In addition, operation of the Project would not interfere with groundwater recharge. As mentioned above, the Project Site is located in an urbanized area and is developed with a low-rise four-level parking structure and a surface parking lot. The Project Site is devoid of landscaping and is entirely impervious. Therefore, the degree to which surface water infiltration and groundwater recharge currently occur on-site is negligible or non-existent. As the Project would include the addition of landscaped areas on the podium level, the amount of impervious surfaces would be reduced during Project operation to less than 100 percent. As such, construction and operation of the Project would not affect groundwater levels

beneath the Project Site, including decreasing groundwater supplies or interfering substantially with groundwater recharge such that sustainable groundwater management of the basin is impeded. Therefore, no impacts on groundwater would occur. No further analysis of this topic in the EIR is required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. The Project Site is composed entirely of an existing parking structure and a surface parking lot, is devoid of landscaping, and is entirely impervious. The Project Site is not crossed by any water courses or rivers. Currently, stormwater runoff from the Project Site is conveyed by sheet flow into the concrete gutters along Hope Street, 8th Street, and Grand Avenue.

The Project Site is relatively flat. As discussed in the Hydrology and Water Quality Memo included as Appendix IS-7, based on available record data and visual observations, a 4-inch curb drain is located on 8th Street, two existing catch basins are located at the intersection of Hope and 8th Street, and one catch basin is located at the intersection of Grand Avenue and 8th Street. Record drawings indicate that the catch basins are piped to a 42-inch diameter reinforced concrete pipe (RCP) located within the 8th Street right-of-way. Based on the record information, this drainage system is owned and maintained by the Los Angeles County Flood Control District (LACFCD). Stormwater runoff from the Project Site would be conveyed by new private underground storm drain pipes to connect to the street and into existing LACFD drainage facilities along 8th Street. Due to the proposed planting areas, the extent of proposed impervious surfaces under the Project would be reduced to less than 100 percent, which would be less than existing conditions. Therefore, the Project would not increase the quantity of stormwater runoff. Since runoff would be reduced with the introduction of landscaped areas, existing storm drain infrastructure would not be adversely impacted. In addition, BMPs would be identified in an Erosion Control Plan and implemented during construction. As part of the Erosion Control Plan, the Project would implement standard erosion controls during site preparation and grading to prevent and reduce the effects of sedimentation and erosion and prohibit the entry of pollutants into the public storm drain during construction. Based on the Geotechnical Report and Hydrology and Water Quality Memo, which are included as Appendices IS-4 and IS-7 of this Initial Study, respectively, on-site infiltration would be feasible as a potential BMP during Project operation. With infiltration and other applicable post-construction BMPs, the Project would support the control of pollutants associated with storm water runoff in compliance with City of Los Angeles Watershed Protection Division LID Standards. Compliance with City storm water mitigation requirements and the addition of landscaping would reduce the quantity and improve the quality of storm water runoff generated on the Project Site. As such, the Project would prevent erosion and prohibit the entry of pollutants into the public storm drain system during operation.

Furthermore, the Los Angeles County Department of Public Works (LACDPW) Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. While the Project Site is entirely impervious under existing conditions, the Project would increase the amount of landscaped areas on the Project Site, which would reduce the percentage of stormwater runoff from the Project Site. The slight reduction in stormwater runoff due to Project landscaping would slightly reduce peak flow rates during a 50-year storm event. Thus, the Project would not increase the stormwater flows from the Project Site. Additionally, during operation, the Project would implement BMPs to ensure compliance with LID requirements, as discussed above. A Final Plan Check as part of the permit process with LADBS would also ensure that there is adequate storm drain capacity available for the Project. The Applicant would be responsible for providing necessary infrastructure to serve the

Project if it is determined to be necessary during the normal permit process. Thus, based on the above, the Project would not alter the existing drainage pattern of the site or surrounding area such that substantial erosion, siltation, or on- or off-site flooding would occur, and, as such, impacts would be less than significant. No further analysis of this topic in the EIR is required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less Than Significant Impact. As discussed above, the Project would not increase the quantity of stormwater runoff. Since runoff would be reduced with the introduction of landscaped areas, existing storm drain infrastructure would not be adversely impacted. Thus, the Project would not alter the existing drainage pattern of the Project Site or surrounding area such that a substantial increase in the rate or amount of surface runoff, or on- or off-site flooding, would occur. As such, impacts would be less than significant. No further analysis of this topic in the EIR is required.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less Than Significant Impact. As discussed above, the Project would implement standard erosion controls during site preparation and grading to reduce the effects of sedimentation and erosion. During operation, the Project would comply with the City's LID Ordinance and implement BMPs to address City and state water quality requirements. In addition, as discussed above, the Project would not increase the quantity of stormwater runoff. Since runoff would be reduced with the introduction of landscaped areas, existing storm drain infrastructure would not be adversely impacted. Thus, the Project would not alter the existing drainage pattern of the site or area in a manner that would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As such, impacts would be less than significant, no further analysis of this topic in the EIR is required.

iv. Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.[42,43] The Project Site is located within an area designated as FEMA Zone X, which denotes an area where potential for flooding is minimal. In addition, there are no surface water bodies in the vicinity. Thus, the Project would not alter the existing drainage pattern of the Project Site in a manner that would impede or redirect flood flows. As such, no impacts would occur, and no further analysis of this topic in an EIR is required.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. As discussed above, the Project Site is not located within a designated 100-year flood plain. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within a flood control basin or within a dam inundation area.[44] Accordingly, the

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42 Federal Emergency Management Agency, Flood Map Service Center, Map Number 06037C1617G, effective on December 21, 2018, https://msc.fema.gov/portal/search?AddressQuery=754%20s%20hope%20st%2C%20los%20angeles%2C%20ca#searchresultsanchor, accessed April 8, 2019.

43 City of Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year & 500-Year Flood Plains, p. 57.

44 City of Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazard Areas, p. 59.

potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would not occur.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity. The Project Site is approximately 15 miles east of the Pacific Ocean. There are no surface water bodies in the vicinity. In addition, the Safety Element of the City of Los Angeles General Plan does not map the Project Site as being located within an area potentially affected by a tsunami.[45] The nearest body of water to the Project Site is MacArthur Park Lake, approximately 1.3 miles northwest of the Project Site. The nearest reservoir is the concrete-lined, off-stream Silver Lake Reservoir, which is not held by a dam, located approximately 3.2 miles north of the Project Site. Thus, inundation as a result of seiche is unlikely. As discussed above, the Project Site and surrounding area are fully developed and generally characterized by flat topography. Since both the state and City do not identify the Project Site within an area prone to landslides, the potential for the Project Site to be inundated by mudflows is also low.[46]

Therefore, no flooding, seiche, tsunami, or mudflow events would be expected to inundate the Project Site, and the Project would not risk release of pollutants due to inundation. As such, no impacts would occur**.** No further analysis of this topic in the EIR is required.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed above and in the Hydrology and Water Quality Memo included as Appendix IS-7, drainage system for the Project Site is owned and maintained by the Los Angeles County Flood Control District (LACFCD). Potential pollutants generated by the Project would be typical of residential, commercial, and school uses and may include sediment, nutrients, pesticides, pathogens, trash and debris, oil and grease, and metals. As described in Response to Checklist Question X.a, the implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Implementation of the LID measures on the Project Site would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not conflict with or obstruct any water quality control plans. In addition, with implementation of the Project's proposed landscaping, impervious surfaces would be reduced. The reduction in impervious areas with proposed street trees would improve the groundwater recharge capacity over existing conditions.

With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no further evaluation of this topic in an EIR is required.

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45 City of Los Angeles General Plan Safety Element, November 1996, Exhibit G, Inundation & Tsunami Hazards Areas, p. 59.

46 See Responses to Checklist Questions VII.a.iv and VII.c, above.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☒	☐
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located in a highly urbanized area. Surrounding uses in the vicinity of the Project Site include the commercial, retail, restaurant, and parking uses. The Project Site is adjacent to an eight-story parking structure, a five-level parking structure, a church, and a commercial building fronting 7th Street to the north. The Bloc, which consists of a department store, hotel, gym, theater, commercial/retail uses, office, and a parking structure are also located to the west of the Project Site across Hope Street. East of the Project Site is a mixed-use development that consists of a market and a high density residential complex. South of the Project Site are multiple office/commercial buildings, a mixed-use development, and a high density residential complex (8th+Hope). Beyond these land uses are other high-rise commercial, mixed use, and residential buildings in the vicinity. The majority of the Central City Community Plan area consists of commercial uses, with smaller pockets of multi-family residential, open space, and public facilities.

As described Section A, Project Description, of the Initial Study, the Project would replace the existing low-rise four-level parking structure and surface parking lot with a new mixed-use project comprised of residential units, a school, and commercial/retail/restaurant uses. The Project includes an option to develop an additional 33 residential dwelling units (for a total of 580 dwelling units) in the event that the school is not developed. The proposed uses are consistent with types of land uses already present or under construction in the surrounding area. In addition, all proposed development would occur within the boundaries of the Project Site as it currently exists. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. Impacts related to the physical division of an established community would be less than significant. No further analysis of this topic in the EIR is required.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. As discussed in Section 3, Project Description, the Project requests several discretionary approvals, including a Transfer of Floor Area Rights (TFAR) for the transfer of greater than 50,000 square feet of floor area from the City of Los Angeles-owned Los Angeles Convention Center to the Project Site; a Vesting Tentative Tract Map; a Site Plan Review; a haul route permit; a variance to provide 25 percent compact residential parking stalls in lieu of one standard space per residential unit; a Director's decision related to planting of ground cover, shrubs, and trees to 15 percent of the common open space; a Zoning Administrator's Interpretation to allow a tandem mechanical parking lift; construction permits; and other discretionary and ministerial permits and

approvals that may be deemed necessary. Accordingly, further analysis of this topic in the EIR is required to determine the Project's consistency with the LAMC, the Community Plan, and other applicable land use plans, policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. In addition, the Project Site is not located within a mineral producing area as classified by the California Geological Survey.[47] The Project Site is also not located within a City-designated oil field or oil drilling area.[48] Therefore, the Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site, and, as such, no impact would occur. No further analysis of this topic in the EIR is required.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As discussed in Response to Checklist Question XII.a, Mineral Resources, above, no mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. As such, the potential for mineral resources to occur on-site is low. In addition, the Project Site is not located within a mineral producing area as classified by the California Geological Survey. The Project Site is also not located within a City-designated oil field or oil drilling area. Therefore, the Project would not result in the loss of availability of a locally-important mineral resource recovery site, and, as such, no impact would occur. No further analysis of this topic in the EIR is required.

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47 California Geological Survey, Aggregate Sustainability in California, Fifty-Year Aggregate Demand Compared to Permitted Aggregate Reserves, 2012.

48 City of Los Angeles Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela/, accessed October 16, 2018.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. The Project Site is located within an urbanized area that contains various sources of noise. The predominant source of noise in the Project area is associated with traffic from roadways. Existing on-site noise sources primarily include vehicle noises associated with the low-rise four-level parking structure and surface parking lot. During Project construction activities, the use of heavy equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) would generate noise on a short-term basis. In addition, with the introduction of new permanent residential, educational, and commercial uses to the Project Site, noise levels from on-site sources including, but not limited to, heating, ventilation and air conditioning systems, loading and unloading of commercial vehicles, outdoor uses associated with the commercial, residential and school uses, may also increase during operation of the Project. Furthermore, traffic and human activities associated with the Project have the potential to increase ambient noise levels along adjacent roadways. Therefore, further analysis of this topic will be provided in the EIR.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project could generate groundborne noise and vibration in association with demolition/site clearance, excavation and grading activities, the installation of building footings, and construction truck travel. As such, the Project would have the potential to generate excessive groundborne vibration and noise levels during short-term construction activities. Therefore, further analysis of this topic will be provided in the EIR.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located within the vicinity of a private airstrip. The closest private airstrip is the Los Alamitos Army Airfield, which is approximately 21 miles southeast of the Project Site. In addition, the Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The closest airport is LAX located approximately 10.5 miles southwest of the Project Site. Given the distance between the Project Site and the closest private airstrip and public airport, the Project would not have the potential to expose people that reside or work in the Project Area to excessive noise levels from these sources of noise. No impacts would occur. No further analysis of this topic in the EIR is required.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The Project would result in the construction of up to 580 new residential dwelling units under the No School Option and 547 residential units under the School Option. As such, the Project would increase the residential population within the Project vicinity. As discussed above in Response to Checklist Question III.a, Air Quality, SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. With regard to future growth, SCAG has prepared the 2016–2040 RTP/SCS, which provides population, housing, and employment projections for cities under its jurisdiction through 2040. The growth projections in the 2016–2040 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG's planning area. The Project Site is located in SCAG's City of Los Angeles Subregion.

According to SCAG's 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2018 is approximately 4,009,193 persons.[49] In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,172,886 persons.[50] Therefore, the projected population growth between 2018 and 2024 is

[49] Based on a linear interpolation of 2012–2040 data.

[50] Based on a linear interpolation of 2012–2040 data.

approximately 163,693 persons. The estimated household size for the City of Los Angeles is 2.43 persons per unit.[51] Using this factor, the Project would generate an on-site population of up to approximately 1,410 persons and would represent approximately 0.86 percent of the anticipated population growth between 2018 and 2024.

According to the 2016–2040 RTP/SCS, the forecasted number of households for the City of Los Angeles Subregion in 2018 is approximately 1,403,671 households.[52] In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,481,843 households.[53] Therefore, the projected household growth in the City between 2018 and 2024 is approximately 78,171 households. The Project would add up to 580 residential units. Thus, the Project's net total of up to 580 residential units would constitute up to approximately 0.74 percent of the housing growth forecasted between 2018 and 2024. Therefore, the Project's housing units would be well within SCAG's housing projection for the Subregion.

The Project would generate approximately 199 new employees based on employee generation rates developed by the Los Angeles Unified School District (LAUSD).[54] According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2018 is approximately 1,797,693 employees.[55] In 2024, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,898,986 employees.[56] Therefore, the projected employment growth in the City between 2018 and 2024 is approximately 101,293 employees. Thus, the Project's estimated 199 new employees would constitute approximately 0.20 percent of the employment growth forecasted between 2018 and 2024. Therefore, the Project would not cause an exceedance of SCAG's employment projections or induce substantial indirect population or housing growth related to Project-generated employment opportunities.

As analyzed above, the net new population and housing that would be generated by the Project would be within SCAG's population and housing projections for the City of Los Angeles Subregion. Therefore, the Project would not induce substantial unplanned population or housing growth. Impacts related to population and housing would be less than significant. No further analysis of this topic in the EIR is required.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. As no housing currently exists on the Project Site, the Project would not cause the displacement of any persons, housing, or require the construction of housing elsewhere. Therefore, no

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51 Based on a 2.43 persons per household rate for multi-family units based on the 2016 American Community Survey 5-Year Average Estimates (2012–2016) per correspondence with Jack Tsao, Research Analyst II, Los Angeles Department of City Planning, March 22, 2018.

52 Based on a linear interpolation of 2012–2040 data. SCAG forecasts "households," not housing units. As defined by the U.S. Census Bureau, "households" are equivalent to occupied housing units.

53 Based on a linear interpolation of 2012–2040 data.

54 Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018, Table 14, p. 19. Based on the "Neighborhood Shopping Centers" rate of 0.00271 employee per square foot, the proposed 7,499 square feet of commercial/retail/restaurant uses would generate approximately 21 employees. To provide a conservative estimate of employees generated by the proposed school uses, the "Standard Commercial Office" rate of 0.00479 employee per square foot is applied. As such, the proposed 37,216 square feet of school use would generate approximately 178 employees.

55 Based on a linear interpolation of 2012–2040 data.

56 Based on a linear interpolation of 2012–2040 data.

impacts related to displacement of people or housing would occur. No further analysis of this topic in the EIR is required.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☒	☐	☐	☐
b. Police protection?	☒	☐	☐	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☒	☐	☐	☐

a. Fire protection?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services to the Project Site. The Project would substantially increase the square footage of development on-site compared to existing conditions and introduce a residential population, which could result in the need for new or physically altered LAFD facilities, the construction of which could cause significant environmental impacts. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on fire protection services provided by the LAFD.

b. Police protection?

Potentially Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services to the Project Site. The Project would substantially increase the square footage of development on-site compared to existing conditions and introduce a residential population, which could result in the need for new or physically altered LAPD facilities, the construction of which could cause significant environmental impacts. Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on police protection services provided by the LAPD.

c. Schools?

Less Than Significant Impact. Public educational services for the Project Site and vicinity are provided by the Los Angeles Unified School District (LAUSD). The public schools that serve students in the Project Site vicinity include 9th Street Elementary School, John H. Liechty Middle School, and high schools in the Belmont Zone of Choice.[57,58] The Project includes the development of new residential land

[57] LAUSD, Resident School Identifier, http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed March 19, 2019.

uses, which directly generate school-aged children and a demand for public educational services. Based on student generation factors provided by the LAUSD 2018 Developer Fee Justification Study, the Project's School Option may generate up to approximately 277 students, including 150 elementary school students, 41 middle school students, and 86 high school students; and the Project's No School Option may generate up to approximately 250 students, including 135 elementary school students, 37 middle school students, and 78 high school students.[59] As such, implementation of the Project would result in an increase in the number of students within the service area of the LAUSD. However, the Project would be required to pay school fees in accordance with Section 65995 of the Government Code. Per these provisions, the payment of these fees constitutes full and complete mitigation of a project's impacts on school facilities. Therefore, with compliance with Section 65995 of the Government Code, which requires payment of the school fees, impacts related to public educational services would be less than significant.

d. Parks?

Less Than Significant Impact. Parks and recreational facilities in the vicinity of the Project Site are primarily operated and maintained by the Los Angeles Department of Recreation and Parks. Nearby parks and recreational facilities within an approximate 2-mile radius of the Project Site include: Pershing Square Park (0.37 mile from the Project Site); Spring Street Park (0.56 mile); San Julian Park (0.76 mile); City Hall Park Center (0.96 mile); Gladys Park (1.01 miles); Vista Hermosa Park (1.07 miles) Hope and Peace Park (1.13 miles); Echo Park Deep Indoor Pool (1.24 miles); Unidad/Beverly Pocket Park (1.24 miles); Toberman Recreation Center (1.27 miles); Los Angeles Plaza Park (1.33 miles); Alvarado Terrace Park (1.33 miles); Patton Street Park (1.34 miles); MacArthur Park Lake (1.36 miles); Arts District Park (1.37 miles); MacArthur Park and Recreation Center (1.44 miles); Pico Union Vest Pocket Park (1.53 miles); Alpine Recreation Center (1.57 miles); Trinity Recreation Center (1.58 miles); Echo Park Recreation Center (1.61 miles); St. James Park (1.61 miles); Hoover Recreation Center (1.69 miles); Lake Street Park, Skate Park, and Community Center (1.72 miles); Everett Triangle Park (1.71 miles); Lafayette Multipurpose Community Center and Skate Park (1.77 miles); Central Park Recreation Center and Pool (1.84 miles); Echo Park Lake (1.85 miles); Lilac Terrace Park (1.94 miles).[60]

As discussed in Section 3, Project Description, of this Initial Study, the Project would develop 547 residential dwelling units, approximately 7,499 square feet of ground floor commercial/retail/ restaurant space, and approximately 37,216 square feet dedicated to a school use. The Project also includes an option to provide 33 additional residential units in lieu of the school use, resulting in a total of 580 residential units for the option. As shown in Table 3 on page 74, under the School Option, the Project is required to provide approximately 60,000 square feet of open space and would provide approximate 60,080 square feet of total open space. Under the No School Option, the Project is required to provide

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58 Belmont Zone of Choice high schools include: Ramon C. Cortines School of Visual & Performing Arts, Edward R. Roybal Learning Center, Belmont Senior High, Miguel Contreras Learning Complex—Academic Leadership Community, Miguel Contreras Learning Complex—Business and Tourism, Miguel Contreras Learning Complex—School of Social Justice, and Miguel Contreras Learning Complex—Los Angeles School of Global Studies.

59 The 2018 LAUSD Developer Fee Justification Study provides student generation rates for Grades K–6, 7–8, and 9–12. For residential uses, the following student generation rates were applied: 0.2269 student per household for Grades K–6, 0.0611 student per household for Grades 7–8, and 0.1296 student per household for Grades 9–12. For the proposed commercial/retail/restaurant use, the "Neighborhood Shopping Center" rate of 0.000610 student per square foot was applied. For the school use, the rate of 0.001077 student per square foot "Standard Commercial Office" space was conservatively used. Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, such students are assumed to be divided among the elementary, middle, and high school levels at the same distribution ratio observed for the residential generation factors (i.e., approximately 54.3 percent for elementary school, 14.6 percent for middle school, and 31.0 percent for high school).

60 City of Los Angeles Department of Recreation and Parks, Facility Map Locator, www.laparks.org/maplocator, accessed February 6, 2019.

Table 3
LAMC Section 12.21-G—Open Space Required and Provided by the School Option

Open Space Requirement	Quantity	Requirement per Unit	Total Required
Studio (less than 3 habitable rooms)	108 du	100 sf per du	10,800 sf
1-bed (less than 3 habitable rooms)	231 du	100 sf per du	23,100 sf
1-bed plus den (3 habitable rooms)	73 du	125 sf per du	9,125 sf
2-bed (3 habitable rooms)	133 du	125 sf per du	16,625 sf
3-bed (more than 3 habitable rooms)	2 du	175 sf per du	350 sf
Total Open Space Required			**60,000 sf**
Open Space Proposed	**Total Provided**		
Outdoor Common			
Level 6 Pool & Fitness Deck	9,744 sf		
Level 17 Co-Work & Art Amenity Deck	5,258 sf		
Level 31 Amenity Deck	4,544 sf		
Outdoor Common Space Subtotal	*19,546 sf*		
Indoor Common			
Level 5 Dog Run[a]	2,300 sf		
Level 6 Pool & Fitness Deck	5,348 sf		
Level 7 Fitness Mezzanine	1,788 sf		
Level 17 Co-Work & Art Amenity Deck	2,134 sf		
Level 31 Amenity Deck	1,419 sf		
Level 45 Tenant Lounge	1,395 sf		
Indoor Common Space Subtotal	*14,384 sf*		
Private			
Unit Balconies	*26,150 sf*		
Total Private and Common Open Space	**60,080 sf**		

du = dwelling units

sf = square feet

[a] *While the dog run is not enclosed, it is covered by the building above and is counted as an indoor amenity area.*

Source: Mitsui Fudosan America, Inc., Gensler, 2019.

approximately 63,450 square feet of open space and would provide approximately 63,544 square feet of total open space. Although the Greater Downtown Housing Incentive Area eliminates the required percentage allocation for common and private open space, the Project would incorporate 26,150 square feet of private balcony under the School Option and 27,850 square feet of private balcony under the No School Option.

Under the School Option, the Project would provide a number of indoor and outdoor common open space areas and recreational amenities, including 14,384 square feet of indoor open space and 19,546 square feet of outdoor open space. The No School Option would provide the same types of open space areas and recreational amenities, including 15,851 square feet of indoor open space and 19,843 square feet of outdoor open space. Specifically, the Project's options would provide a covered dog run area to accommodate pets on the Level 5; an indoor and outdoor common open space area with a pool, gym, spa, yoga pavilion, juice bar, barbeque and dining areas, seating, event lawn, and game lounge on Level 6; an indoor fitness area on Level 7; common indoor and outdoor open space featuring a

coffee and snack bar, board room, sound lab, seating, and co-working spaces on Level 17; common indoor and outdoor open space featuring a pavilion, water feature, gathering garden, dining areas, a catering kitchen, and lounge on Level 31; and an indoor tenant lounge on Level 45.

LAMC Section 12.21-G generally requires that common open space be open to the sky; however, enclosed recreation rooms of at least 600 square feet or greater may count as common open space, but cannot qualify for more than 25 percent of the total required usable open space. As shown in Table 4 on page 76, the Project's indoor common amenities would meet the minimum 600-square-foot size requirement. In total, under the School Option, these enclosed recreation areas totaling 14,384 square feet would comprise approximately 23.97 percent of the total open space required. Under the No School Option, the 15,851 square feet of enclosed recreation areas would comprise approximately 24.98 percent of the total open space required. Therefore, these enclosed areas would not exceed the 25 percent maximum, and the Project would be consistent with this provision of the LAMC.

In addition, the Project would also comply with LAMC requirements related to landscaped and planted areas, upon requested approval a Director's Decision to allow a 10-percent reduction in the required area for planting of ground cover, shrubs, and trees to 15 percent of the common open space provided in lieu of 25 percent of the common open space provided. LAMC Section 12.21-G requires one 24-inch box tree per four dwelling units. Based on 547 dwelling units proposed by the School Option, 137 trees would be required. The School Option would provide a total of 137 trees and would be consistent with this LAMC provision. In addition, based on the 580 dwelling units proposed by the No School Option, 131 trees would be required with approval of the Director's Decision. The No School Option would also provide 137 trees and would be consistent with the LAMC provision.

Due to the amount, variety, and convenience of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would primarily utilize on-site open space to meet their recreational needs. While the Project's residents would also be expected to use off-site public parks and recreational facilities to some degree, there are numerous parks and recreational facilities in the vicinity of the Project Site, as listed above. Thus, the Project would not be expected to create the need for additional off-site public parks or recreational facilities, or cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

While it is possible that some of the Project's new employees from the proposed commercial uses and the school (if implemented under the School Option) may utilize local parks and recreational facilities, this increased demand would be negligible as it is anticipated that the majority of Project employees would be more likely to use parks and recreational facilities near their homes during non-work hours. Furthermore, it is anticipated that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site and who already generate a demand for parks. As such, the potential indirect growth in demand for parks and recreational facilities would be minimal.

Furthermore, pursuant to LAMC Section 12.33, subdivision projects consisting of more than 50 residential units are subject to a Quimby in-lieu fee. All other residential projects are subject to a park mitigation fee. LAMC Section 12.33 requires all new subdivisions containing residential dwelling units or joint living and work quarters to dedicate land, pay a fee, or provide a combination of land dedication and fee payment for the purpose of developing park and recreational facilities for new residents. Although the Project would not include dedicated parkland, LAMC Section 17.12 provides that common open space may be partially credited against a project's land dedication requirement if approved by the City. However, there is the potential that some or all of the Project's recreational amenities may not be credited toward the Project's land dedication requirement, in which case the Project would be required to pay

Table 4
LAMC Section 12.21-G—Open Space Required and Provided by the No School Option

Open Space Requirement	Quantity	Requirement per Unit	Total Required
Studio (less than 3 habitable rooms)	108 du	100 sf per du	10,800 sf
1-bed (less than 3 habitable rooms)	258 du	100 sf per du	25,800 sf
1-bed plus den (3 habitable rooms)	73 du	125 sf per du	9,125 sf
2-bed (3 habitable rooms)	139 du	125 sf per du	17,375 sf
3-bed (more than 3 habitable rooms)	2 du	175 sf per du	350 sf
Total Open Space Required			**63,450 sf**
Open Space Proposed	**Total Provided**		
Outdoor Common			
Level 6 Pool & Fitness Deck	10,052 sf		
Level 17 Co-Work & Art Amenity Deck	5,189 sf		
Level 31 Amenity Deck	4,602 sf		
Outdoor Common Space Subtotal	*19,843 sf*		
Indoor Common			
Level 5 Dog Run[a]	2,900 sf		
Level 6 Pool & Fitness Deck	6,200 sf		
Level 7 Fitness Mezzanine	1,788 sf		
Level 17 Co-Work & Art Amenity Deck	2,134 sf		
Level 31 Amenity Deck	1,419 sf		
Level 45 Tenant Lounge	1,410 sf		
Indoor Common Space Subtotal	*15,851 sf*		
Private			
Unit Balconies	*27,850 sf*		
Total Private and Common Open Space	**63,544 sf**		

du = dwelling units
sf = square feet
[a] *While the dog run is not enclosed, it is covered by the building above and is counted as an indoor amenity area.*
Source: Mitsui Fudosan America, Inc., Gensler, 2019.

in-lieu fees as determined by the City. Through one or a combination of these methods, as determined by the City, the Project would comply with LAMC Sections 12.33 and 17.12.

Based on the above, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks. Impacts would be less than significant. No further analysis of this issue in an EIR is required.

e. Other public facilities?

Potentially Significant Impact. The residential population generated by the Project may result in additional demand for library services provided by the Los Angeles Public Library (LAPL), possibly necessitating the construction of new libraries which could cause significant environmental impacts.

Therefore, further analysis of this topic in the EIR is required to determine the Project's potential impacts on library services provided by the LAPL.

No other public services would be notably impacted by the Project. Therefore, the Project would have no impacts on other public facilities. No further analysis of other public facilities in the EIR is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. As discussed above in Response to Checklist Question XV.d, Public Services, there are numerous public parks and recreational facilities within two miles of the Project Site. While the population increase associated with the Project could generate additional demand for parks and recreational facilities in the vicinity of the Project Site, due to the amount, variety, and availability of the proposed open space to be provided within the Project Site, it is anticipated that Project residents would often utilize on-site open space to meet their recreational needs. As described above, the Project would provide a number of indoor and outdoor common open space areas and recreational amenities throughout the Project Site, including a covered dog run area, pool, spa, gym and fitness areas, yoga pavilion, juice bar, barbeque and dining areas, seating, event lawn, game lounge, coffee and snack bar, board room, sound lab, co-working spaces, water feature, gathering garden, a catering kitchen, and lounges. Therefore, while Project residents would be expected to use off-site public parks and recreational facilities to some degree, that use would be spread among the many parks and recreational facilities in the vicinity of the Project Site, and the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

In addition, while it is possible that some new employees may utilize local parks and recreational facilities, It is anticipated that the majority of Project employees would be more likely to use parks and recreational facilities near their homes during non-work hours. Additionally, the new employment opportunities that would be generated by the Project may be filled, in part, by employees already residing in the vicinity of the Project Site who already utilize existing parks and recreational facilities. Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Central City Community Plan area, new demand for public parks and recreational facilities associated with Project development would be limited.

Furthermore, as detailed above in Response to Checklist Question XV.d, the Project would comply with LAMC Sections 12.33 and 17.12 to pay in-lieu fees, and as determined by the City, may have common open space credited against its land dedication requirement.

Based on the above, the Project would not substantially increase the demand for off-site public parks and recreational facilities, such that substantial physical deterioration of those facilities would occur or be accelerated. The impact on parks and recreational facilities would be less than significant. No further analysis of this issue in an EIR is required.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project would not include the development of public recreational facilities or require the expansion of recreational facilities which might have an adverse physical effect on the environment, as discussed above in Response to Checklist Question XV.d. Therefore, impacts would be less than significant. No further analysis of this issue in an EIR is required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☒	☐	☐	☐

a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. Construction of the Project has the potential to affect the transportation system through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site. In addition, operation of the proposed uses would also generate vehicle and transit trips throughout the day. The resulting increase in the use of the area's transportation facilities could conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Therefore, further analysis of this issue will be provided in the EIR.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?[61]

Potentially Significant Impact. Implementation of the Project would generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment. In addition, such vehicle trips may exceed the LOS standards currently used by LADOT to evaluate traffic impacts. Therefore, further analysis of this topic in the EIR is required.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the residential and commercial uses in the Project vicinity. Thus, no impacts related to increased hazard to a geometric design feature would occur. No further analysis of this topic in the EIR is required.

d. Result in inadequate emergency access?

Potentially Significant Impact. While it is expected that construction activities for the Project would primarily be confined within the Project Site, construction activities could potentially require temporary and intermittent lane closures on adjacent streets for the installation or upgrading of local infrastructure. Construction within these roadways has the potential to impede access to adjoining uses, as well as reduce the rate of flow of the affected roadway. The Project would also generate construction traffic, particularly haul trucks, which may affect the capacity of adjacent streets and highways. In addition, once constructed, the Project's density would increase and the site's entrance and exit access would be modified. Therefore, further analysis of this topic in the EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐

[61] While this Appendix G Checklist Question has been modified by the Natural Resources Agency to address consistency with CEQA Guidelines section 15064.3, subdivision (b), which relates to use of the vehicle miles travelled (VMT) as the methodology for evaluating traffic impact, the City has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, the analysis is based on LADOT's adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Potentially Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in PRC Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As noted above, the Project would require excavations to previously undisturbed depths. Therefore, the potential exists for the Project to significantly impact a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe. In compliance with AB 52, the City will notify all applicable tribes and the Project will participate in any requested consultations. Further analysis of this topic will be provided in the EIR.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water, Electric Power, and Natural Gas

Potentially Significant Impact. Given the Project's increase in the amount of developed floor area on the Project Site and the potential corresponding increase in water, electricity and natural gas demand, further analysis of these topics will be provided an EIR.

Wastewater

Less than Significant Impact. With regard to wastewater, wastewater generated during Project operation would be collected and discharged into existing sewer mains and conveyed to the Hyperion Water Reclamation Plant (HWRP). The HWRP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant (TWRP) and the Los Angeles–Glendale Water Reclamation Plant (LAGWRP). The treatment capacity of the entire Hyperion Treatment System is approximately

550 million gallons per day (mgd) (consisting of 450 mgd[62] at HWRP, 80 mgd[63] at TWRP, and 20 mgd[64] at LAGWRP). The HWRP is designed to treat 450 mgd, with annual increases in wastewater flows limited to 5 mgd by the Sewer Allocation Ordinance (City Ordinance No. 166,060). The HTP currently processes an average of 275 mgd on dry weather days and, therefore, has an available treatment capacity of approximately 175 mgd.[65] Wastewater from the Project Site enters the system through an existing 8-inch sewer main on Hope Street and the 10-inch sewer main on Grand Avenue and flows through the remaining wastewater system to the HWRP.

As shown in the Utility Memo included as Appendix IS-8, based on sewage generation factors established by LADPW, Bureau of Engineering (BOE), the Project would generate an average of approximately 67,658 gallons per day (gpd) of wastewater.[66] As provided in Attachment C of the Utility Memo, the City has approved the Sewer Capacity Availability Request for the Project, indicating that the existing 8-inch sewer main on Hope Street and the 10-inch sewer main on Grand Avenue would have adequate capacity to accommodate 90 percent and 10 percent of the additional infrastructure demand created by the Project, respectively.[67] Therefore, as the existing mains would accommodate 100 percent of the Project's infrastructure demand, the HWRP would have adequate capacity to serve the Project. No upgrades to existing sewer mains would be required.

Therefore, the Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site, and impacts with respect to wastewater infrastructure would be less than significant. No further analysis of this topic in the EIR is required.

Stormwater Drainage

Less Than Significant Impact. As discussed in Response to Checklist Question X, stormwater flows from the Project Site would not increase with implementation of the Project. Additionally, the Project would provide appropriate on-site drainage improvements to better control runoff. The Project would be required to comply with the City's LID Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. To this end, BMPs would be implemented to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system. The proposed landscaping would reduce the quantity and improve the quality of stormwater runoff generated on the Project Site. This system would include infiltration drywells that would be strategically placed so as not to significantly impact the environment or existing infrastructure. A combination of BMPs for stormwater treatment may also be used to meet the LID stormwater treatment

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62 City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=7u4vnxjs2_1796&_afrLoop=1736734617710097#!, accessed August 10, 2018.

63 City of Los Angeles Department of Public Works, Bureau of Sanitation, Donald C. Tillman Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-dctwrp?_adf.ctrl-state=7u4vnxjs2_1796&_afrLoop=1736474174443544#!, accessed September 10, 2018.

64 City of Los Angeles Department of Public Works, Bureau of Sanitation, Los Angeles–Glendale Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-lagwrp?_adf.ctrl-state=7u4vnxjs2_1796&_afrLoop=1736575544717143#!, accessed September 10, 2018.

65 City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=7u4vnxjs2_1796&_afrLoop=1736734617710097#!, accessed September 10, 2018.

66 The School Option was used for this analysis as it generates a greater amount of wastewater when compared with the No School Option.

67 City of Los Angeles Department of Public Works, Bureau of Engineering, Sewer Capacity Availability Request, September 13, 2018.

requirements. With implementation of these requirements, the on-site stormwater system would be designed to provide an overflow discharge that would flow into existing LACFD facilities that would have adequate capacity to accommodate the Project Site flows. Therefore, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities, and, as such, impacts would be less than significant. No further analysis of this topic in the EIR is required.

Telecommunications

Less Than Significant Impact. The Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. Impacts would be less than significant. No further analysis of this topic in the EIR is required.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. The Los Angeles Department of Water and Power (LADWP) supplies water to the Project Site. As previously discussed, the Project would result in an increase in water demand for water provided by LADWP. Therefore, further analysis of this topic will be provided in the EIR.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant. As described above, the HWRP has a capacity of 450 mgd and current wastewater flow levels are at 275 mgd, resulting in available capacity of 175 mgd. As discussed above, the Project would result in an increase in a wastewater generation of 67,658 gpd. The Project's increase in average daily wastewater flow of 68,411 gpd would represent approximately 0.04 percent of the 175 mgd remaining capacity. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the HWRP, and, as such, impacts would be less than significant. No further analysis of this topic in the EIR is required.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. While the Los Angeles Bureau of Sanitation (LASAN) generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal

solid waste is disposed of in Class III landfills, while inert waste, such as construction waste, yard trimmings, and earth-like waste, are disposed of in inert waste landfills.[68] Ten (10) Class III landfills and one inert waste landfill with solid waste facility permits are currently operating within the County.[69] In addition, there are two solid waste transformation facilities within Los Angeles County that convert, combust, or otherwise process solid waste for the purpose of energy recovery.

In 2017, the City of Los Angeles disposed of approximately 2.49 million tons of solid waste at the County's Class III landfills and approximately 22,248 tons at transformation facilities.[70,71] The 2.49 million tons of solid waste accounts for approximately 1.66 percent of the total remaining capacity (149.77 million tons) for the County's Class III landfills open to the City as of December 31, 2017.[72,73]

The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 55.71 million tons of remaining capacity and an average daily in-County disposal rate of 1,057 tons per day. Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. Based on the most recent 2017 ColWMP Annual Report, the remaining total disposal capacity for the County's Class III landfills is estimated at 167.58 million tons.[74]

Based on the 2017 ColWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2032 will not exceed the 2017 remaining permitted Class III landfill capacity of 167.6 million tons. The Annual Report also evaluated six scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with five of the six scenarios. Only the scenario involving utilization of permitted in-county disposal capacity only would result in a shortfall. The Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling; expand existing landfills; study, promote, and develop alternative technologies; expand transfer and processing infrastructure; and use out-of-county disposal, including waste-by-rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of becoming a "zero waste" city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs, such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.

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68 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

69 County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019. The 10 Class III landfills within the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

70 These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.

71 County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions by Los Angeles (Reporting Period: January 2017 to December 2017).

72 (2.49 million tons ÷ 149.77 million tons) × 100 = 1.66 percent.

73 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019, Appendix E-2, Table 1.

74 County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019, Appendix E-2, Table 1.

The City of Los Angeles is currently diverting 76.4 percent of its waste from landfills.[75] The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project's construction and operation solid waste generation.

Construction

Pursuant to the requirements of Senate Bill 1374,[76] the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the inert waste landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. Based on the U.S. Environmental Protection Agency's (USEPA's) generation rate of 4.38 pounds per square foot of development, the Project's 562,696 square feet of new development would generate approximately 1,232 tons of construction waste.[77] Given the remaining permitted capacity of the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 149.77 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Operation

As discussed in the Project Description, the Project includes approximately 562,696 square feet of floor area, with 547 residential dwelling units, approximately 7,499 square feet of ground floor commercial/retail/restaurant space and 37,216 square feet dedicated to a school use. The school use includes 14 classrooms to accommodate up to 400 students. The Project also includes an option wherein an additional 33 residential units may be constructed in lieu of the school use, resulting in a total of 580 residential units for the option. The School Option generates more solid waste than the No School Option and, thus, was used for this analysis. As shown in Table 5 on page 86, upon full buildout under the School Option, the Project would generate approximately 1,372 tons per year of solid waste. Due to the Project Site's current use as a low-rise four-level parking structure and a surface parking lot, existing waste generation is considered negligible and is not factored into this figure. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures, such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's recycLA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[78,79] The estimated annual net increase in solid waste that would be generated by the Project

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75 LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=gsqomd6ij_58&_afrLoop=2758546764573440#!, accessed April 17, 2019.

76 Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

77 U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, p. 2-3.

78 The recycLA program divides the City into 11 zones and designates a waste collection company for each zone. Source: LA Sanitation, recycLA, Your Plan, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf/s-lsh-wwd-s-zwlaf-yp?_adf.ctrl-state=gsqomd6ij_352&_afrLoop=2759902882328667#!, accessed April 17, 2019.

Table 5
Estimated Project Solid Waste Generation

Proposed Land Use[a]	Units	Employees,[b] Households, or Visitors	Generation Rate[c]	Total Solid Waste Generated (tons/year)
Residential	547 du	547 hh	2.23 tons per hh per year	1,220
Commercial/Retail/Restaurant	7,499 sf	21 emp	2.98 tons per emp per year	63
School	37,216 sf	178 emp	0.5 ton per emp per year	89
Total Generation				**1,372**

du = dwelling unit

emp = employees

hh = households

sf = square feet

lbs = pounds of solid waste

[a] *The Project's School Option generates more solid waste than the No School Option and, thus, provides a more conservative analysis.*

[b] *Employee Generation Rates from the Los Angeles Unified School District 2018 Developer Fee Justification Study, March 2018, Table 14, p. 19. For commercial/retail/restaurant uses, the "Neighborhood Shopping Center" rate of 0.00271 employee per square foot was used. For the school use, the rate of 0.00479 employee per square foot for "Standard Commercial Office" space was conservatively used.*

[c] *Non-residential yearly solid waste generation factors are from City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, Table 4, July 2002, p. 9. Assumes rates for "Retail—Restaurants" (2.98 tons per employee per year) for commercial/retail/restaurant uses and "Services—Educational" (0.5 ton per employee per year) for school use. Residential rate is from L.A. CEQA Thresholds Guide, p. M.3-2.*

Source: Eyestone Environmental, 2019.

represents approximately 0.055 percent of the City's annual solid waste disposal[80] and approximately 0.0009 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles.[81] The Project's estimated solid waste generation would, therefore, represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

Based on the above, the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste generated by the construction and operation of the Project, and, as such, impacts would be less than significant. No further analysis of this topic in the EIR is required.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Solid waste management in the state is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and

79 Mayor's Office of Sustainability, Sustainable City pLAn 2nd Annual Report 2016–2017, March 2017, p. 41.

80 (1,372 tons per year ÷ 2.49 million tons per year) × 100 = 0.055%

81 (1,372 tons per year ÷ 149.77 million tons) × 100 = 0.0009%

composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills.

In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste[82] on and after April 1, 2016, depending on the amount of waste generated per week. Beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would comply with and be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include an on-site recycling area or room of specified size.[83] The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, impacts would be less than significant. No further evaluation of this topic in an EIR is required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

[82] Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

[83] Ordinance No. 171687, adopted by the Los Angeles City Council on August 6, 1997.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. There are no wildlands located in the vicinity of the Project Site. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone[84] or within a City-designated fire buffer zone.[85] Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks would occur, and no further evaluation of this topic in an EIR is required.

[84] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Reports for 754 S. Hope St., 609 W. 8th St., and 625 W. 8th St., http://zimas.lacity.org/, accessed August 17, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

[85] City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As discussed above, the Project is located in a highly urbanized area and would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. In addition, with compliance with existing regulations and with incorporation of mitigation measures listed in Response to Checklist Question No. V.b and Response to Checklist Question No. VII.f, impacts to unknown archaeological and paleontological resources that may be encountered during construction would be less than significant. However, the Project does have the potential to affect important examples of California history with respect to tribal cultural resources that may be encountered during construction. Therefore, further evaluation of this topic will be required in the EIR. b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of the Project are combined with impacts from other development to result in impacts that are greater than the impacts of the Project alone. Located within the vicinity of the Project Site are other current and reasonably foreseeable projects whose development, in conjunction with that of

the Project, may contribute to potential cumulative impacts. Impacts of the Project on both an individual and cumulative basis will be addressed in the EIR for the following subject areas: air quality, energy, GHG emissions, land use and planning, noise, public services (i.e., fire protection, police protection, and other public facilities), transportation, tribal cultural resources, and utilities and service systems (i.e., water supply, electric power, and natural gas).

With regard to cumulative effects for the issues of agricultural and forest resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population and housing, schools, parks and recreation, utilities (i.e., wastewater, storm water, telecommunications, and solid waste), and wildfire, the Project would not combine with related projects or other cumulative growth to result in significant cumulative impacts. Specifically, with respect to aesthetics, pursuant to SB 743, the Project's impacts would not be significant. Furthermore, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Thus, and pursuant to SB 743, cumulative impacts associated with aesthetics would be less than significant.

With respect to agricultural and forest resources and mineral resources, the Project would have no impact to these resources and, therefore, could not combine with other projects to result in cumulative impacts. With respect to biological resources, the Project Site is located in an urbanized area, and, similar to the Project, other developments occurring in the Project area would occur on previously disturbed land. The Project does not contain these resources and, therefore, could not contribute to a cumulative effect. With respect to hazards and hazardous materials, cultural resources, geology and soils, hydrology and water quality, stormwater drainage, and telecommunications, these resource areas are generally site-specific and need to be evaluated within the context of each individual project. Furthermore, related projects would be required to comply with existing regulatory requirements and the City's standard mitigation practices during construction, which address these topics. Specifically for hydrology and water quality, related projects that disturb more than one acre of soil would also be required to obtain coverage under the NPDES Construction General Permit (Order No. 2009-0009-DWQ as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ) pursuant to NPDES requirements. Impacts with regards to this topic would be limited to the Project Site and not be increased when viewed in conjunction with related projects.

With regard to population and housing, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed above, the estimated 1,410 new residents generated by the Project would represent approximately 0.86 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2018 and 2024, and up to 580 new residential units would constitute up to approximately 0.74 percent of the housing growth forecasted between 2018 and 2024. As discussed in the analysis above, the employment, housing and population generated by the Project would be well within SCAG growth forecasts.

With regard to schools, the Project would include the development of new residential land uses, which directly generate school-aged children and an increase in the number of students within the service area of the LAUSD. However, the Project would be required to pay school fees in accordance with Section 65995 of the Government Code, which would constitute full and complete mitigation of a project's impacts on school facilities. Similarly, while the demand on school facilities from related projects could also directly generate school-aged children and result in an increased demand on LAUSD school facilities, such related projects would also be required to comply with fee requirements. As such, payment of fees by the related projects would also result in full and complete mitigation of impacts on school

facilities. Therefore, Project impacts on the school facilities would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to parks and recreation, as discussed above, the Project would provide on-site open space and recreational amenities in accordance with LAMC requirements, and would pay Quimby in-lieu fees as required. As such, the Project would not be expected to result in a substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the nearby facilities would occur or be accelerated. The related projects would also be required to provide open space and recreational amenities or comply with the LAMC and fee requirements, which would offset any potential impacts to parks and recreation facilities associated with development of related projects. Therefore, Project impacts to parks and recreation facilities would not be cumulatively considerable and would be less than significant.

With regard to wastewater, similar to the Project, new development projects occurring in the Project vicinity would be required to coordinate with LASAN to determine adequate sewer capacity. In addition, new development projects would also be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. In order to connect to the sewer system, related projects in the City of Los Angeles would be subject to payment of the City's Sewerage Facilities Charge. Payment of such fees would help offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and LASAN to construct the necessary improvements. Furthermore, each related project would be required to comply with applicable water conservation programs, including the City of Los Angeles Green Building Code. Therefore, Project impacts on the City's wastewater infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to solid waste, the Project's incremental contribution to potential cumulative impacts would not be cumulatively considerable. As discussed above, estimated annual increase in solid waste generated by the Project would represent approximately 0.050 percent of the City's annual solid waste disposal and approximately 0.0016 percent of the remaining capacity for the County's Class III landfills that are open to the City. Also, forecasts of regional demand are prepared for these services and their ability to meet future demand. Based on the 2016 CoIWMP Annual Report, the County anticipates that future solid waste disposal needs can be adequately met through 2030.

With regard to wildfire, there are no wildlands located within the vicinity of the Project Site and surrounding related projects. The Project Site is not located within a City-designated Very High Fire Hazard Severity Zone or within a City-designated fire buffer zone. Therefore, the Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Cumulative impacts related to wildfire would be less than significant.

Therefore, cumulative impacts with respect to these topics would be less than significant, and no further analysis of these topics in the EIR is required.

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As indicated by the analysis above, the Project could result in potentially significant impacts with regard to the following topics: air quality, energy, GHG emissions, land use and planning, noise, public services (i.e., fire protection, police protection, and other public facilities),

transportation, tribal cultural resources, and utilities and service systems (i.e., water supply, electric power, and natural gas). As a result, these potential effects will be analyzed further in the EIR.